

IN THE U.S. DISTRICT COURT OF THE SOUTHERN DISTRICT OF NEW YORK

BARBARA STONE
PLAINTIFF

CASE NO: _____

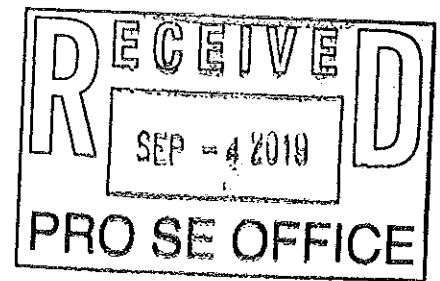
19 CV 8264

vs

WILLIAM ELMORE, INDIVIDUALLY AND IN HIS CAPACITY AS A MANAGER AND
INVESTMENT ADVISOR WITH OPPENHEIMER AND CO.
100 NE 3RD AVE – 5TH FLOOR
FT LAUDERDALE, FL 33301
DEFENDANT

OPPENHEIMER HOLDINGS INC.
125 BROAD STREET
NEW YORK, NY
DEFENDANT

OPPENHEIMER & CO. INC.
85 BROAD ST
NEW YORK, NY 10004
DEFENDANT



ALBERT G. LOWENTHAL, INDIVIDUALLY AND IN HIS CAPACITY AS CEO AND A
DIRECTOR OF OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY 10004
DEFENDANT

ROBERT S. LOWENTHAL, INDIVIDUALLY AND IN HIS CAPACITY AS A DIRECTOR
OF OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY 10004
DEFENDANT

EVAN BEHRENS, INDIVIDUALLY AND IN HIS CAPACITY AS A DIRECTOR OF
OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY 10004
DEFENDANT

TIMOTHY M. DWYER, INDIVIDUALLY AND IN HIS CAPACITY AS A DIRECTOR OF
OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY 10004
DEFENDANT

WILLIAM J. EHRHARDT, INDIVIDUALLY AND IN HIS CAPACITY AS A DIRECTOR
OF OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY 10004
DEFENDANT

PAUL M. FRIEDMAN, INDIVIDUALLY AND IN HIS CAPACITY AS A DIRECTOR OF
OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY 10004
DEFENDANT

TERESA A. GLASSER, INDIVIDUALLY AND IN HER CAPACITY AS A DIRECTOR OF
OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY 10004
DEFENDANT

A. WINN OUGHTRED, INDIVIDUALLY AND IN HIS CAPACITY AS A DIRECTOR OF
OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY
DEFENDANT

R. LAWRENCE ROTH, INDIVIDUALLY AND IN HIS CAPACITY AS A DIRECTOR OF
OPPENHEIMER HOLDINGS, INC.
125 BROAD STREET
NEW YORK, NY
DEFENDANT

COMPLAINT

JURY TRIAL DEMANDED

**FULL EN BANC PANEL OF JUDGES IS SOUGHT BECAUSE OF THE GRAVE
AND EXTRAORDINARY HUMAN RIGHTS VIOLATIONS, PUBLIC POLICY
CONSIDERATIONS AND UNLAWFUL ACTIONS OF GOVERNMENT OFFICIALS
OF ANOTHER STATE, STONE SEEKS A FULL EN BANC PANEL OF JUDGES
OBJECTION IS MADE AND NO CONSENT GIVEN TO MAGISTRATE JUDGE**

**I. NOTICE OF TOXIC ALLIGATOR SWAMP INFESTATION, CORRUPTION
AND LAWLESS COURTS IN THE STATE OF FLORIDA
WHICH BREED A STATE OF FLORIDA SPONSORED
SERIAL MURDER, HUMAN TRAFFICKING AND WAR CRIMES
RACKETERING ENTERPRISE**

**AND VICIOUS RETALIATION AND ATTACKS AGAINST PLAINTIFF AND
OTHERS WHO EXPOSE THE FLORIDA TOXIC SWAMP**

1. Plaintiff Barbara Stone ("Stone") and her mother Helen Stone ("Mrs. Stone") are victims of crimes in the nature of war crimes being committed by lawless corrupt Florida government officials, state and federal actors and other corrupt Florida entities.
2. This lawsuit is undoubtedly the most significant of the century as it addresses the most important issue in our nation – the utter lawlessness of our courts and our law enforcement agencies resulting in state sponsored crime rackets taking place in the courts.
3. The State of Florida is the corruption and lawless capital of the country.¹ South Florida leads the state.
4. **NINE DEAD BODIES** of vulnerable adults were found in an urn in the office of Rebecca Fierle² who under the auspices of and by means of a "certificate" issued by the State of

¹ **Florida Is The Most Corrupt State In The Country, According To ...**
https://www.huffpost.com/entry/florida-most-corrupt-in-country_n_1577571

Miami-Dade's Most Corrupt Cities Ranked | Miami New Times
<https://www.miaminewtimes.com/.../miami-dades-most-corrupt-cities-ranked-1053346...>

Jul 17, 2018 - South Florida has had some iconic pairs over the years, but none ... Law Enforcement suspected was filled with a big wad of corruption money.

Miami named one of the most corrupt cities nationwide - South Florida ...
<https://www.sun-sentinel.com/.../fl-ne-miami-ranked-among-most-corrupt-cities-2019...>

Harvard finds Florida among most politically corrupt states in U.S.
<https://floridapolitics.com/.../191150-harvard-says-florida-one-of-americas-most-politi...>

Sep 25, 2015 - Florida is also listed as one of America's most corrupt states, along with Arizona, California, Kentucky, Alabama, Illinois, New Jersey, Georgia, ...

What is the evidence that Florida is the most corrupt of the 50 ...
<https://www.quora.com/What-is-the-evidence-that-Florida-is-the-most-corrupt-of-the-50...>

Jul 30, 2018 - There appears to be an overwhelming amount of websites devoted to exposing corruption in Florida.
Is the city of Tallahassee the most corrupt in Florida as President ...

<https://www.politifact.com/florida/.../city-tallahassee-most-corrupt-florida-president-tr/>

Claim: Andrew Gillum's "city, Tallahassee, is known as the most corrupt in Florida, and one of the most corrupt in the nation." Claimed by: Donald Trump Fact check by PolitiFact: FBI probe ongoing

Justice Network - Florida Corruption - NoSue.org

<https://www.nosue.org/florida-corruption/>

Jun 7, 2012 - A new study by nonprofit Integrity Florida ranks the Sunshine State as the country's most corrupt. According to the "Corruption Risk Report: ...

FBI agents went undercover in Florida's capital for the 'biggest ...
<https://www.usatoday.com/story/news/nation-now/2017/.../floridas.../566090001/>

Aug 14, 2017 - Public corruption is the FBI's chief criminal investigative priority and is He's also led the state Democratic party and made runs for Florida ...

What's the matter with Florida? Corrupt local officials - Washington Times
<https://www.washingtontimes.com/.../whats-the-matter-with-florida-county-supervisor...>

Nov 11, 2018 - Money may not grow on trees, but in Florida, apparently voter ballots do. ... means that the results won't be reviewed by state officials until Nov.

² **AG: 9 urns found in office of ex-guardian accused of filing ...**

www.wftv.com/news/local/ag-9-urns-found-in...

Florida Attorney General Ashley Moody said Wednesday morning that investigators found nine urns containing cremated human remains while searching the office of a former professional guardian.

Cremated remains of 9 people found in office of embattled ...
edgewaterweather.com/2019/08/07/cremated-remains...

Florida has been human trafficking³ looting and murdering vulnerable adults throughout Florida for over 20 years under the guise of “guardianship” a term coined by corrupt

followed revelations that Fierle signed ‘Do Not Resuscitate,’ or DNR orders, for most of her wards. Court records reviewed by WESH 2 News show Fierle has handled more than 800 Guardian cases in nine local counties over two decades. Fierle’s wards were individuals who are physically or mentally incapacitated and appointed a guardian.

Adam Walser I-Team - Posts | Facebook

www.facebook.com/AdamWalserITeam/posts

FDLE and Orange County Sheriff's Deputies found 9 urns containing human remains and one believed to contain remains of a dog when they served a search warrant on embattled guardian Rebecca Fierle's office. Investigators don't know who the remains came from, when they died, or why they were stored in her office.

Americans Against Abusive Probate Guardianship - Facebook

www.facebook.com/AAAPG.net/posts

Clearly, the local AP stringers here in Orlando for the Associated P... res aren't wanting to rush deeper into any guardianship violation news I've tried and tried to get Monivette and Jessica and Debra and others to launch into deeper and damaging stories about Judge Thorpe's antics, Judge Rodriguez's striking eccentricity, former Senator Bill Nelson's staff knowledge of local probate abuses ...

³ Is Elder Guardianship A New Form Of Human Trafficking?

nasga-stopguardianabuse.blogspot.com/2016/09/is...

A 2013 AARP report gave a “best guess” estimate of the number of adults under ... within the Florida Department of Elder ... a form of human trafficking. On the ...

America's Shame: Trafficking Our Elderly | SENIOR LIVING WATCH

seniorlivingwatch.wordpress.com/2014/01/21/...

2 thoughts on “ America’s Shame: Trafficking Our Elderly ” cgd1947 January 25, 2016 at 3:13 PM. There is another form of elder human traffic that can take place in the elder’s own home.

Is Elder Guardianship A New Form Of Human Trafficking? | HuffPost Life

https://www.huffingtonpost.com/dr-terri.../is-elder-guardianship-a-n_b_11970144.ht...

Sep 13, 2016 - In *Florida*, there are 5 million *people* age 60 and older and that ... Yet, *seniors* who have come to this retirement haven are actively being ...

Judge Martin Colin had a hand in his wife's guardianship cases, state ...

<https://www.palmbeachpost.com/...guardianship.../sWv6eYgvcDeubugXhCoQ4H/>

Sep 1, 2018 - Now nearly a decade later, the state of *Florida* spells out in an wanting out of an assisted care facility full of *elderly people* that her current ..

Elder Guardianship Abuse – www.elderdignity.org

elderdignity.org/elder-guardianship-abuse/

Doctors – Sign off on the incapacity of the *senior* and often refers a petitioner to a ... In *Florida* and Flagler County, these predators are allowed to liquidate the *senior's* ... Post articles, “Is Elder *Guardianship* a New Form of *Human Trafficking*?”

<https://www.abcactionnews.com/.../theyre-court-appointed-to-protect-the-elderly-but-...>

Feb 21, 2019 - Professional *guardians* have become a booming industry in *Florida*, ... They're court-appointed to protect the *elderly*, but who's policing *Florida guardians*? *Florida* doesn't limit how many *people guardians* can oversee and ...

Seniors Stripped Of The Right To Vote; Florida Is A Hotspot | HuffPost ...

https://www.huffpost.com/entry/seniors-stripped-of-the-r_b_12794608

Nov 7, 2016 - As explained in “Is Elder *Guardianship* A New Form Of *Human Trafficking*?”, *guardianships* are supposed to protect older citizens. However ...

Guardians from Hell – Tablet Magazine

<https://www.tabletmag.com/scroll/264932/guardians-from-hell>

Jun 21, 2018 - On June 6, Lourdes filed a petition for *guardianship on* the grounds “To isolate and prohibit an *aging* Mrs. Stone from seeing her daughter is heartbreaking to this GAL. “In 2003 in *Florida*, there were 23 professional *guardians*,” he said.

judges, attorneys, legislators and guardians to imply legitimacy to a deadly human trafficking racket that has become Florida's biggest underground enterprise (the "Florida Sanctioned Guardian Racket"). The 9 dead bodies are the tip of the iceberg in this murder for hire ring run through the Florida courts.

5. Rebecca Fierle is supposedly being "investigated" by the Florida Department of Law Enforcement, a vastly corrupt and dysfunctional corrupt Florida agency who has been covering up her crimes for years each time as hundreds of reports by family members to this agency have been ignored and obstructed.
6. **Florida's shamelessly corrupt and inept governor, Ron DeSantis when asked about ONE HUNDRED AND THIRTY TWO criminal complaints against Fierle and other serial killers of Florida's vulnerable adults being human trafficked in the guardian racket, scratched his head and essentially said "duh, someone should be responsible."**⁴
7. Far from acting responsibly, thereafter, all criminal complaints were dismissed with a "no action" letter and serial murderer Rebecca Fierle remains unindicted and a public danger.
8. The state of Florida legal system has become a paradigm for institutionalized corruption and fraud.
9. As far back as 1987, Claude Pepper, a Florida congressman, said of guardianships: **"The typical [person subject to guardianship] has fewer rights than the typical convicted felon... It is, in one short sentence, the most punitive civil penalty that can be levied against an American citizen, with the exception, of course, of the death penalty."**
10. The swamp infested State of Florida is quite likely the biggest murder for hire, human trafficking, money laundering operation in the world. Florida's biggest business and dirtiest secret is the human trafficking of its citizens under the guise of "guardianship" where affluent retired and older adults, are targeted and forced into "guardianship" to loot their assets. These vulnerable adults are traded and sold just like slaves.
11. When complaints setting forth crimes of the Florida Sponsored Guardian Racket are filed with the Governor and the Attorney General, they willfully and wantonly pretend they are not responsible and deviously divert Plaintiffs to other agencies who deny responsibility in a dance of deception by all Florida officials.
12. Moreover, in criminal conflict of interest; acts of rebellion and insurrection against the Constitution; and obstruction of justice, the Attorney General of Florida use public funds to provide counsel who are employees of the State of Florida and the Attorney General to represent and defend the corrupt judges in the Florida Sponsored Guardian Racket when lawsuits are brought against them.
13. The Attorney General and Florida state actor officers routinely ignore their mandate under the Florida and U.S. Constitution to protect the public from danger and ignore their oath of office to uphold the Constitution. They routinely willfully and wantonly pretend they are not responsible to protect Plaintiff and divert and mislead Plaintiff by directing her to other agencies when such other agencies do not have jurisdiction or prosecutorial power and when it is the office of the Attorney General who is responsible to enforce the law pursuant to Florida corporate organizational chart ⁵ as the Attorney General is well aware.

⁴ <https://aaapg.net/aaapg-at-desantis-event-4-10-19/>

⁵ <https://florida-politics.com/florida-government-organizational-chart/>

14. In addition to the state of Florida sponsored murder for hire and human trafficking of its affluent vulnerable adults, the state of Florida has proliferated the sex trafficking, raping and atrocities imposed on untold numbers of young girls by its cover up and accompaniment of the Jeffrey Epstein debacle.
15. Guardianship / human trafficking is rampant in the state of Florida because of its large population of retired affluent senior adults.
16. As described in Paragraph III herein, Stone's mother has been captured into and is being human trafficking in the Florida Sponsored Guardian Racket.
17. Sickenly ironic is the fact that Stone herself filed the guardianship proceeding to protect her mother from documented crimes of abuse and financial exploitation by Stone's sibling and Mrs. Stone's son, Alan Stone who is an employee of Defendant Oppenheimer and Co. and is under the direct supervision of Defendant, William Elmore.
18. Alan Stone isolated Mrs. Stone from the eyes of the world, and caused Mrs. Stone to be repeatedly admitted by emergency to the hospital with suspicious falls and fractures and embezzled over \$700,000 of her assets by secret wire transfers and forged checks.
19. Isolation is always the precursor of exploitation and abuse as this enables predators to commit their crimes in secret.
20. This is the case when predators like Alan Stone seeks to steal assets from and abuse vulnerable adults like Mrs. Stone and this is the case when pedophiles seek to sexual molest children where they threaten them from exposing their crimes.
21. Law enforcement knows or should know the horrific consequences of isolating a vulnerable adult or a child.
22. Yet, as described in Paragraph III, because law enforcement in Florida is inept and corrupt, they refused to criminally investigate.
23. Law enforcement has been responsible for untold number of deaths of vulnerable adults and children in the state of Florida because they are a protection racket. Reference should be made to the front page Miami Herald article exposing that OVER FOUR HUNDRED CHILDREN DIED BECAUSE OF THE CRIMINAL COMPLICITY AND NEGLIGENCE OF THE "FLORIDA SYSTEM".⁶
24. Not only is the Florida "system" criminally complicit and negligent, but they act as their own protection racket for their corruption racket.⁷
25. So too, is their protection racket in place with regard to Florida's vulnerable adults as evidenced by the dead bodies in the Rebecca Fierle debacle.
26. Thus Stone had no choice but to file a guardianship for her mother, naively expecting that her mother would be protected by the courts.
27. Of course, the appropriate and needed remedy was the arrest of Alan Stone, the return of the stolen assets to Mrs. Stone and the protection of Mrs. Stone from Alan Stone's abuse.
28. Instead in the sick, demented lawless state of Florida, Mrs. Stone has been:

⁶ **How the Miami Herald told the story of 477 child deaths – Poynter**

www.poynter.org/reporting-editing/2014/how-the-...

Carol Marbin Miller has six long, deep drawers filled with child death cases. "And each one is as bad as the one before it," she said in a phone interview with Poynter. Since the mid-1990s ...

⁷ **Florence Snyder: Bondi refuses to defend Florida's Sunshine ...**

www.ocala.com/opinion/20160703/florence-snyder...

The Department of Children and ... with the well-oiled BS detector of the Miami Herald's CarolMarbin Miller, ... story of how Hines ended up in Florida and the children ended up dead, but only ...

- a. criminalized and illegally stripped of her rights;
 - b. captured in an illegal fraudulent guardianship without medical need;
 - c. forcibly disappeared from her home, her family and the world;
 - d. her home was sold from under her and the proceeds embezzled by the Florida Sponsored Guardian Racket;
 - e. forcibly secluded in a vile "nursing facility" that violated Florida building code;
 - f. possibly sexually molested as Stone's mother is in a vile facility secluded from the eyes of the world;⁸
 - g. looted of her life savings;
 - h. brutally and ruthlessly drugged with illegally psychotropic drugs that contain black box warnings against their use by elder adults as they cause cardiac arrest and stroke. Mrs. Stone has suffered cardiac arrest from their use;
 - i. repeatedly emergency hospitalized and brought to the brink of death by depraved indifference to her life.
29. Instead of obtaining protection and remedy for her mother, Stone, a law abiding citizen who never had so much as a traffic ticket prior to the guardianship has been:
- a. viciously attacked, stalked and harassed;
 - b. repeatedly false incarcerated for attempting to protect her mother;
 - c. illegally gag ordered to prohibit her from reporting her mother's abuse;
 - d. stripped of her property and life savings in a fraudulent SLAPP⁹ lawsuit by a crony predator of William Elmore and his shyster attorney Mark Francis Raymond;
 - e. forced to file bankruptcy twice;
 - f. deprived of her law license as a result of perjured attacks against her after she was a retired attorney after being in practice for over 20 years without a client complaint and having received a letter of appreciation for her services;
 - g. lost her livelihood;
 - h. buried in vicious, ceaseless, retaliatory litigation orchestrated by William Elmore, Mark Francis Raymond and others in order to obstruct Stone from seeking remedy against the Florida Sponsored Guardian Racket;
 - i. Stone is forced to relive this nightmare each time she responds to or files litigation;
 - j. Stone's very existence is wiped out as she is consumed by out-of-control litigation. She is embroiled in overwhelming, never ending litigation where pending cases spawn

⁸ Sick, dying and raped in America's nursing homes - CNN.com
<https://www.cnn.com/health/nursing-home-sex-abuse-investigation>

Feb 22, 2017 - You don't prepare for a phone call that your mother has been RAPED." ... And the man accused of rape and abuse ... The unthinkable is happening at facilities throughout the country: Vulnerable seniors are being raped and in the shower while a female resident was inside it, showing her his erect penis ...

⁹ A strategic lawsuit against public participation (SLAPP) is a lawsuit that is intended to censor, intimidate, and silence critics by burdening them with the cost of a legal defense until they abandon their criticism or opposition. Such lawsuits have been made illegal in many jurisdictions on the grounds that they impede freedom of speech. In the typical SLAPP, the plaintiff does not normally expect to win the lawsuit. The plaintiff's goals are accomplished if the defendant succumbs to fear, intimidation, mounting legal costs, or simple exhaustion and abandons the criticism. In some cases, repeated frivolous litigation against a defendant may raise the cost of directors and officers liability insurance for that party, interfering with an organization's ability to operate. A SLAPP may also intimidate others from participating in the debate. A SLAPP is often preceded by a legal threat. From Wikipedia, the free encyclopedia

a ceaseless array of other staged, relentless, futile litigation.

- k. While corrupt Mark Francis Raymond is a billing machines who thrives financially on the orchestrated litigation, Stone is drowning in a shameful cesspool of corruption that steals her of her livelihood, family and quality of life.
- l. NO ONE SHOULD BE SUBJECTED OR HAVE TO LIVE WITH THESE ATROCITIES ON THE ORDER OF THE THIRD REICH REGIME.
- m. If this happened to a dog, the media would pounce and the perpetrator would be in jail.
30. This matter is the result of and epitomizes the tsunami of Florida corruption, lawlessness and cover up, having originated in the Florida Sponsored Guardian Racket, wherein the life, liberty and property of Stone and her mother, Helen Stone, a vulnerable adult is threatened and in grave danger.
31. Stone's mother is now subjected to an illegal Do Not Resuscitate order as was the case with Rebecca Fierle's victims before they were serially killed by her.
32. This perverse story is played out all over the state of Florida.
33. William Elmore and his shyster pervert attorney Mark Francis Raymond and the firm Nelson Mullins Riley and Scarborough are masterminds and perpetrators of the Florida Sponsored Guardian Racket.
34. The extent of atrocities and terrorism to which Stone and her mother have been subjected is a sickening reflection of how the state of Florida deviously runs its legal system in reverse, eroding the rights of its citizens instead of protecting their rights by using illegal penal procedural and "local" rules that violate the constitution and defy logic to thwart substantive due process, substantive remedy and obstruct justice.
35. Because judicial corruption has festered for so long, an illusory set of laws that mirror Bernie Madoff's two sets of books has been created by the Florida judiciary; one legitimizing the criminal acts of judges and other public officials; and the other criminalizing the legal acts of the public, both taking place in state of Florida sanctioned color of law courts.
36. In order to conduct this diabolical crime of embezzlement, looting and murder for hire through the courts, the predator involves conjure outlandish methods to keep their crimes secret from the public.
37. This is done by orchestrating a variety of ways to remove their prey, the vulnerable adult, from their home and their family members to perpetrate their crimes in secret.
38. In the Miami-Dade county judicial racket, there is actually a "drop down" on the filing portal menu of criminal activities wherein a predator can request an "isolation" order as if they are ordering a hamburger from McDonalds.
39. These crimes are executed brazenly because the predators know they are protected all the way up the food chain in Florida by all state and federal courts, all state and federal law enforcement agencies and all state and federal legislators.
40. The atrocities are far worse than even the horrific abuse and exploitation crimes enumerated in the Florida statutes and similar state statutes across the country.
41. The crimes fall with the definition of "war crimes"¹⁰ and Crimes against Humanity¹¹ as is evident herein. "Isolation" of an elderly adult is a felony crime. However these crimes of

¹⁰ The relevant provisions of 18 U.S. Code § 2441-War crimes

(a)OFFENSE.—Whoever, whether inside or outside the United States, commits a war crime, in any of the circumstances described in subsection (b), shall be fined under this title or imprisoned for life or any term of years, or both, and if death results to the victim, shall also be subject to the penalty of death.

(c) **DEFINITION.**—As used in this section the term “war crime” means any conduct—

(1) defined as a grave breach in any of the international conventions signed at Geneva 12 August 1949, or any protocol to such convention to which the United States is a party;

(2) prohibited by Article 23, 25, 27, or 28 of the Annex to the Hague Convention IV, Respecting the Laws and Customs of War on Land, signed 18 October 1907;

(3) which constitutes a grave breach of common Article 3 (as defined in subsection (d)) when committed in the context of and in association with an armed conflict not of an international character; or

(4) of a person who, in relation to an armed conflict and contrary to the provisions of the Protocol on Prohibitions or Restrictions on the Use of Mines, Booby-Traps and Other Devices as amended at Geneva on 3 May 1996 (Protocol II as amended on 3 May 1996), when the United States is a party to such Protocol, willfully kills or causes serious injury to civilians.

(d) **COMMON ARTICLE 3 VIOLATIONS.**—

(1) **PROHIBITED CONDUCT.**—In subsection (c)(3), the term “grave breach of common Article 3” means any conduct (such conduct constituting a grave breach of common Article 3 of the international conventions done at Geneva August 12, 1949), as follows:

(A) **Torture.**—The act of a person who commits, or conspires or attempts to commit, an act specifically intended to inflict severe physical or mental pain or suffering (other than pain or suffering incidental to lawful sanctions) upon another person within his custody or physical control for the purpose of obtaining information or a confession, punishment, intimidation, coercion, or any reason based on discrimination of any kind.

(B) **Cruel or inhuman treatment.**—

The act of a person who commits, or conspires or attempts to commit, an act intended to inflict severe or serious physical or mental pain or suffering (other than pain or suffering incidental to lawful sanctions), including serious physical abuse, upon another within his custody or control.

(D) **Murder.**—The act of a person who intentionally kills, or conspires or attempts to kill, or kills whether intentionally or unintentionally in the course of committing any other offense under this subsection, one or more persons taking no active part in the hostilities, including those placed out of combat by sickness, wounds, detention, or any other cause.

(E) **Mutilation or maiming.**—The act of a person who intentionally injures, or conspires or attempts to injure, or injures whether intentionally or unintentionally in the course of committing any other offense under this subsection, one or more persons taking no active part in the hostilities, including those placed out of combat by sickness, wounds, detention, or any other cause, by disfiguring the person or persons by any mutilation thereof or by permanently disabling any member, limb, or organ of his body, without any legitimate medical or dental purpose.

(F) **Intentionally causing serious bodily injury.**—The act of a person who intentionally causes, or conspires or attempts to cause, serious bodily injury to one or more persons, including lawful combatants, in violation of the law of war.

(G) **Rape.**—The act of a person who forcibly or with coercion or threat of force wrongfully invades, or conspires or attempts to invade, the body of a person by penetrating, however slightly, the anal or genital opening of the victim with any part of the body of the accused, or with any foreign object.

(H) **Sexual assault or abuse.**—The act of a person who forcibly or with coercion or threat of force engages, or conspires or attempts to engage, in sexual contact with one or more persons, or causes, or conspires or attempts to cause, one or more persons to engage in sexual contact.

(I) **Taking hostages.**—The act of a person who, having knowingly seized or detained one or more persons, threatens to kill, injure, or continue to detain such person or persons with the intent of compelling any nation, person other than the hostage, or group of persons to act or refrain from acting as an explicit or implicit condition for the safety or release of such person or persons.

Deliberate indifference is the conscious or reckless disregard of the consequences of one's acts or omissions. Deliberate difference is criminal recklessness and criminal law generally permits a finding of recklessness only when a person disregards a risk of harm of which he is aware. *Cooper v. County of Washtenaw*, 222 Fed. Appx. 459, 466 (6th Cir. Mich. 2007)

¹¹ Crimes against humanity as set forth in the Cornell Law Institute https://www.law.cornell.edu/wex/crime_against_humanity refer to a category of crimes against international law which includes the most egregious violations of human dignity, especially those directed toward civilian populations. The modern understanding of crimes against humanity is codified in the founding statutes of the international criminal tribunals, including the International Criminal Tribunal for the Former Yugoslavia (ICTY)

the Florida Sanctioned Guardian Racket extent far beyond the felony crimes of "isolation" – the crime being committed falls within the definition of "forcible disappearance."¹²

42. As an integral part of "isolating" the vulnerable adult from their homes, their family members and their surroundings, the Florida Sanctioned Guardian Racket has concocted diabolical tactics to threaten and extort the family member. These tactics include trampling their Constitutional rights to expose their crimes by issuing illegal gag orders, contempt orders and causing their false arrest.¹³
43. Attached (Exhibit A) is the step by step agenda of the Florida Sponsored Guardian Racket.
44. As shown in the attached agenda:
 - a. A vulnerable adult is ambushed in their homes by colluding "medical providers" who are paid by the state of Florida to provide a phony "medical opinion" of "incapacity" after a two minute encounter with their unsuspecting prey;

and the International Criminal Court (ICC). As codified in Article 7 of the ICC Statute, the following acts are punishable as crimes against humanity when perpetrated by a state actor as part of a systematic or widespread attack against a civilian population:

- murder;
- extermination;
- deportation or forcible transfer;
- false imprisonment;
- torture;
- rape, sexual slavery, or enforced sterilization;
- ethnic persecution;
- disappearance;
- apartheid;
- "Other inhumane acts of a similar character intentionally causing great suffering, or serious injury to body or to mental or physical health."

¹² In international human rights law, a **forced disappearance** (or **enforced disappearance**) occurs when a person is secretly abducted or imprisoned by a state or political organization or by a third party with the authorization, support, or acquiescence of a state or political organization, followed by a refusal to acknowledge the person's fate and whereabouts, with the intent of placing the victim outside the protection of the law.

According to the Rome Statute of the International Criminal Court, which came into force in July 2002, when committed as part of a widespread or systematic attack directed at any civilian population, a "forced disappearance" qualifies as a crime against humanity. It gives victims' families the right to seek reparations, and to demand the truth about the disappearance of their loved ones. The Convention provides for the right not to be subjected to enforced disappearance, as well as the right for the relatives of the disappeared person to know the truth and contains provisions concerning prevention, investigation and sanctioning of this crime, as well as the rights of victims and their relatives, and the wrongful removal of children born during their captivity. Disappearances work on two levels: not only do they silence opponents and critics who have disappeared, but they also create uncertainty and fear in the wider community, silencing others who would oppose and criticise. Disappearances entail the violation of many fundamental human rights. For the disappeared person, these include the right to liberty, the right to personal security and humane treatment (including freedom from torture), the right to a fair trial, to legal counsel and to equal protection under the law, and the right of presumption of innocence among others. Their families, who often spend the rest of their lives searching for information on the disappeared, are also victims.

Often, forced disappearance implies murder. The victim in such a case is abducted, illegally detained and often tortured during interrogation, and killed, with the body hidden. Typically, a murder will be surreptitious, with the corpse disposed of to escape discovery so that the person apparently vanishes. The party committing the murder professes plausible deniability, as nobody can provide evidence of the victim's death

¹³ Stone has been repeatedly falsely arrested by being falsely accused of violating illegal void contempt and gag orders.

- b. whereupon these vulnerable adults are seized by complete strangers and placed into a covert operation; stripped of their human, civil and Constitutional rights, declared dead under the law, become humanly owned and the human possession of a third party stranger without a license or any credentials;
 - c. they vulnerable adult is human trafficked; secreted from the eyes of the world and their families;
 - d. The perpetrators of these crimes seek to carry out their organized crimes in secret. Therefore, at the onset of an illegal guardianship, they falsely accuse family members of outlandish crimes in order to obtain an illegal gag orders that prohibit family members from reporting crimes to law enforcement and illegal isolation orders in simulated color of law "guardian" courts to remove their prey from their family members in order to perpetrate their crimes in secret;
 - e. the vulnerable adult not provided counsel or permitted to testify in court;
 - f. their family members are erased on the court records and prohibited from appearing in court under threat of imprisonment;
 - g. the vulnerable adult and their family members are subjected to ceaseless, contrived staged litigation in order to orchestrate legal fees that Florida Sponsored Guardian Racketeers extort from the vulnerable adult;
 - h. The litigation is incited by the Florida Sponsored Guardian Racket by committing depraved atrocities against the vulnerable adult in order to orchestrate legal fees which they extort from their prey, the vulnerable adult they are holding in captivity. Embezzling their assets is child's play and the perfect crime as the life savings of the vulnerable adult is illegal transferred to the fake guardian at the time the vulnerable adult in placed in guardianship.
 - i. the life savings, home and all personal possession of the vulnerable adult are embezzled in secret by this blasphemous racketeering enterprise run through the Florida courts.
 - j. The vulnerable adult is subjected to illegal do not resuscitate orders and are viciously and ruthless drugged with illegally psychotropic drugs to cause their death after their assets have been embezzled.
45. The Florida Sponsored Guardians Racket is the classic racket where illusory problems are created by the very persons who benefit. A "racket" is a term used to describe a criminal enterprise designed to extort money to solve a nonexistent problem that would not exist but for its creation by the extorter. In the Florida Sponsored Guardian Racket, the racket is carried out through fabricated litigation orchestrated by the racketeers to extort legal fees to litigate a problem they create, i.e., a nonexistent problem that would not exist without the racket. The family member is subjected to an identical racketeering agenda by their own attorneys who collude with the orchestrated problem and offer to solve it, concealing the fact they are acting in collusion with the Florida Sponsored Guardian Racketeers as they intend to engender continual patronage by the family member.
46. A retired judge, Justice John F. Molloy himself felt compelled to write a book entitled *The Fraternity: Lawyers and Judges in Collusion* to warn the public and expose the tsunami of corruption¹⁴. These are excerpts from Justice Molloy's book¹⁵.

¹⁴ <http://judicialcorruptionnews.com/arizona-judge-exposes-corruption/>

47. The article and book is highly understated, revealing a mere fraction of the corrupt activities of the Courts and the government. The toxic corruption in the judicial system is a well known America phenomenon throughout the world. Mainstream media, unconventional press organizations and grassroots movements alike have exposed the systemic American judicial corruption and the devastation it wreaks on American families.
48. The Machiavellian Florida Sponsored Guardian Racket wherein a fictitious color of law proceeding is used to embezzle the assets of and commit atrocities against Florida's vulnerable citizens has been devised and compiled by a racketeering enterprise of color of law judges and attorneys who run this crime ring through the court by colluding in the issuing of void, illegal orders to make it appear a legitimate proceeding is taking place.
49. It is inconceivable that Stone is forced to seek futile remedy from the very same corrupt lawless governmental agencies who are subjecting her to atrocities for which she seeks relief.
50. Stone should be lauded not vilified for attempting to restore elementary human rights and fundamental due process into a lawless Florida legal system that has regressed into a barbaric, third world, wild west criminal racket.
51. The Florida Sponsored Guardian Racket run by corrupt judges is analogous to the diabolical scheme concocted by dirty judges in the Kids for cash scandal ¹⁶that rocked Pennsylvania which was made into a documentary, as will the Florida Sponsored Guardian Racket scandal.

Justice Molloy is probably best known for his time serving as Chief Justice to Court of Appeals for the State of Arizona, where he authored the famous Miranda decision that was subsequently appealed to the U.S. Supreme Court and overturned, resulting in what is known today as the "Miranda Rights" which law enforcement now quotes to suspected criminals upon arrest.

¹⁵ Justice Molloy defines "**Lawyer domination**," stating "When a lawyer puts on a robe and takes the bench, he or she is called a judge. But in reality, when judges look down from the bench they are lawyers looking upon fellow members of their fraternity. **In any other area of the free-enterprise system, this would be seen as a conflict of interest**" (emphasis added). "When a lawyer takes an oath as a judge, it merely enhances the ruling class of lawyers and judges. **Surely it's time to question what has happened to our justice system and to wonder if it is possible to return to a system that truly does protect us from wrongs**" (emphasis added).

¹⁶ Kids for cash scandal - Wikipedia

https://en.wikipedia.org/wiki/Kids_for_cash_scandal

The scandal was featured in Capitalism: A Love Story, the 2009 documentary by Michael Moore. A full-length documentary covering the scandal entitled Kids for Cash was released in February 2014, and has been favorably reviewed. In April 2014, CNBC's crime documentary series American Greed reported on

Corrupt 'Kids for Cash' judge ruined more than 2,000 lives

<https://nypost.com/2014/02/23/film-details-teens-struggles-in...>

The scandal was called "**Kids for Cash**," and it rocked the state in 2009 — for the accusation that Ciavarella was happy to tear families apart in exchange for the payoff.

Author: Larry Getlen

Kids For Cash: Inside One of the Nation's Most Shocking ...

https://www.democracynow.org/2014/2/4/kids_for_cash_inside_one_of

AMY GOODMAN: That's the trailer for Kids for Cash, a new documentary years in the making, features interviews with the children, with the parents and two judges at the heart of the scandal.

Pennsylvania rocked by 'jailing kids for cash' scandal ...

www.enn.com/2009/CRIME/02/23/pennsylvania.corrupt.judges

3,000 kids. 1 judge. Millions of dollars. This riveting doc reveals the untold stories of a judicial scandal that rocked America and the chilling aftermath of the lives destroyed in the process. "**Kids for Cash**" reveals a shocking American secret told from the perspectives of the villains, the victims and the unsung heroes who helped uncover the scandal

'Kids For Cash' Captures A Juvenile Justice Scandal From ...

<https://www.npr.org/2014/03/08/287286626/kids-for-cash-captures-a...>

52. Thousands of juveniles were illegally arrested and sent to a prison which was an investment of the judges who sentenced these children in their bribery, kickback racket.
53. Untold numbers of children committed suicide and thousands of families were destroyed.
54. This racket took place in plain and open sight of the world FOR OVER 5 YEARS until a Federal Judge ordered a criminal investigation and indictment of these dirty corrupt judges.
55. The inescapable consequence of Florida's corruption cesspool is personified by the perverted acts of defendant William Elmore and his enabler attorney Mark Francis Raymond who will stop at nothing to intimidate Stone to silence her from exposing their crimes, including their attempted deprived heart murder of her mother.¹⁷
56. This litigation is the result of human trafficking and other crimes committed against Stone and her mother by perverted predators, William Elmore in collusion with shyster corrupt attorney, Mark Francis Raymond with Nelson Mullins Riley and Scarborough.
57. Perverted predators, William Elmore and Mark Francis Raymond sought each other out to collude together to spew vicious attacks on Stone and retaliate against her by causing her to be imprisoned for purportedly exercising her right to free speech and allegedly exposing their organized crime racket.
58. In their ongoing effort to bully, harass and attempt to silence Stone from exposing their perverted acts against Stone's mother and Stone, Mark Francis Raymond and William Elmore have engaged in a combat attack on Stone by filing a SLAPP lawsuit against her in the Miami courts, the corruption cesspool capital of the world, to trample her First Amendment rights under the Constitution and embezzle her assets.
59. In a criminal conflict of interest, Mark Francis Raymond also represents Alan Stone in the Florida Sponsored Guardian Racket wherein Mark Francis Raymond and Alan Stone are human trafficking Mrs. Stone.
60. Mark Francis Raymond has solicited Alan Stone's employer, William Elmore to join him in his attacks on Stone and attempts to keep Stone from exposing his human trafficking and other crimes.
61. This too is a criminal conflict of interest as Mark Francis Raymond is using his client William Elmore as an accomplice to his human trafficking, protection racket.
62. Mark Francis Raymond as the shyster attorney for William Elmore filed an illegal, retaliatory SLAPP lawsuit against Stone in Miami to attempt to silence Stone for purportedly exercising her right to free speech and exposing his depraved crimes against humanity and human trafficking of a vulnerable adult.

Mar 08, 2014 · In 2009, a major corruption scandal dubbed "Kids for Cash" hit the juvenile justice system of northeast Pennsylvania. Two local judges had ...

¹⁷ "Depraved heart murder is the form of murder that establishes that the willful doing of a dangerous and reckless act with wanton indifference to the consequences and perils involved, is just as blameworthy, and just as worthy of punishment, when the harmful result ensues, as is the express intent to kill itself. This highly blameworthy state of mind is not one of mere negligence. It is not merely one even of gross criminal negligence. It involves rather the deliberate perpetration of a knowingly dangerous act with reckless and wanton unconcern and indifference as to whether anyone is harmed or not. The common law treats such a state of mind as just as blameworthy, just as anti-social and, therefore, just as truly murderous as the specific intents to kill and to harm." <http://www.duhaime.org/LegalDictionary/D/DepravedHeartMurder.aspx>

Deliberate indifference is the conscious or reckless disregard of the consequences of one's acts or omissions. Deliberate difference is criminal recklessness and criminal law generally permits a finding of recklessness only when a person disregards a risk of harm of which he is aware. *Cooper v. County of Washtenaw*, 222 Fed. Appx. 459, 466 (6th Cir. Mich. 2007)

63. The lawsuit is actually a personal vendetta by Mark Francis Raymond as Mark Francis Raymond and William Elmore harbor a vicious, sadistic grudge against Stone.
64. Mark Francis Raymond therefore recruited William Elmore to orchestrate the illegal SLAPP lawsuit against Stone in Elmore's name to retaliate against her for purportedly exercising her right to free speech and exposing their depraved crimes against humanity and human trafficking of a vulnerable adult.
65. Mark Francis Raymond is a human trafficker, money launderer, organized crime racketeer with a law certificate. By his enlistment of his corrupt client, William Elmore to perpetrate his crimes and sue Stone, he is violating a litany of bar ethical rules.¹⁸
66. Further Mark Francis Raymond is representing and colluding with clients, Alan Stone and William Elmore who are perpetrating criminal acts in criminal conflict of interest and violation of ethical bar rules.
67. Stone therefore defines and hereinafter refers to William Elmore as "No-Penis Elmore" and to Mark Francis Raymond as "No-Penis Raymond" as this characterization is highly appropriate to describe males who terrorize, bully, abuse and torment defenseless vulnerable women over whom they exert control and hide behind. This court is mandated to report these crimes and ethical violations under 18 USC 4, judicial canons and other laws.

II. JURISDICTION AND VENUE

68. The allegations set forth in Paragraphs 1-68 are incorporated herein.
69. This court has jurisdiction over this matters as:
 - a. The amount in dispute is over \$75,000
 - b. Pursuant to 28 U.S.C. 1343 and 2201
 - c. The following Federal Questions:
 - d. 18 U.S.C. § 1983 Civil Action for Deprivation of Rights
 - e. 18 U.S.C. § 241 Conspiracy against Rights
 - f. 18 U.S.C. § 242 Deprivation of Rights under Color of Law
 - g. 18 U.S.C. § 2511 Organized Crime
 - h. 18 U.S.C. § 1951 Hobbs Act
 - i. 42 U.S.C. § 12101 et seq., the American's with Disabilities Act 1990 as amended and The Civil Rights Act of 1964, USC § 1983, 1985, 1988
 - j. 42, U.S.C. § 14141: Pattern and Practice
 - k. 42 U.S.C §1985, 42 USC Sec. §1986, 28 U.S.C. § 1443, 28 USC §1441, 28 USC §1331,

¹⁸ See ABA Standards for Imposing Lawyer Sanctions § 5.11(b) (1986) (disbarment appropriate when lawyer engages in "intentional conduct involving dishonesty, fraud, deceit, or misrepresentation that seriously adversely reflects on the lawyer's fitness to practice."). See Florida Bar rule 3-4.3 (engaging in the commission of an act that is unlawful or contrary to honesty and justice); and rule 4-8.4(c) (engaging in conduct involving dishonesty, fraud, deceit or misrepresentation).

The Florida Bar v. Steven Evan WOLIS, Respondent, No. SC97019 (2001).

The court therein stated: "Wolis[s] offense for which he was convicted goes to the very essence of the legal profession. The truth cannot be sacrificed for convenience or personal gain. It cannot be abrogated because of a client's needs. Simply stated, society must be able to rely upon an attorney's representations. The Oath of Admission to The Florida Bar, The Rules Regulating the Florida Bar and the interest of the general public mandate that attorneys tell the truth and act in an honorable fashion."

1871 Civil Rights Act in relation to the deprivation and violation of fundamental rights of procedural and substantive due process.

- l. Article III section 2 which extends the jurisdiction to cases arising under the U.S. Constitution.
 - m. Violation of First, Fifth, Eighth, Ninth, and Fourteenth Amendments (No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person within its jurisdiction the equal protection of the laws).
 - n. Supplemental jurisdiction over Federal and State Law Claims for Extrinsic Fraud, Fraud on the Court, Fraudulent Misrepresentation, Perjury, Harassment, Stalking, Fraudulent Inducement, Conspiracy, Fraud in the Inducement, Unclean Hands Doctrine,
 - o. 18 U.S.C. § 1961 et seq. ("Racketeer Influenced and Corrupt Organizations Act" or "RICO").
 - p. 18 U.S.C. § 1965, which allows for nationwide jurisdiction pursuant to the Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. §§ 1961-1968 if at least one defendant "resides" is found, has an agent or transacts his affairs" in the forum.¹⁹
 - q. This Court has jurisdiction over this matter as Plaintiffs cannot obtain remedy in any other court.
 - r. This Court has supplemental jurisdiction over this action pursuant to 28 U.S.C. § 1367. III.
70. Venue is proper in this Court as Defendants reside and/or maintain a business in New York.

III. INTRODUCTION

71. The allegations set forth in Paragraphs 1-70 are incorporated herein.
72. This matter originates from a guardianship which Stone herself in an ironic travesty of epic proportions filed to protect her mother, Helen Stone, a vulnerable adult from documented abuse and exploitation from her sibling, Alan Stone who is Mrs. Stone's son and an employee of Oppenheimer and Co. under the supervision of No-Penis Elmore.
73. Stone was forced to file "guardianship" the antithesis of an appropriate remedy as Stone was unable to obtain remedy for her mother's abuse by any court or law enforcement agency.
74. The needed remedy would be the criminal investigation of Alan Stone's crimes and his indictment and arrest.

¹⁹ See *Rolls-Royce Corp. v. Heros, Inc.*, 576 F.Supp.2d 765, 778-79 (N.D. Tex. 2008) (citing cases); *Oblivio Telecom, Inc. v. Patel*, No. 3-08-CV-0279-L, 2008 WL 4936488 at *4 (N.D. Tex. Nov. 18, 2008) (citing cases). Stated differently, if a RICO plaintiff can show that at least one defendant "resides, is found, has an agent, or transacts his affairs" in the forum, then jurisdiction is proper as to all other defendants if "the ends of justice require." *Rolls-Royce*, 576 F.Supp.2d at 779; *Paolino v. Argyll Equities, L.L.C.*, 401 F.Supp.2d 712, 718 (W.D. Tex. 2005).

In a RICO action, the "ends of justice" require nationwide service of process to further the Congressional intent of allowing "plaintiffs to bring all members of a nationwide [] conspiracy before a court in a single trial." *Butcher's Union Local No. 498 v. SDC Investments, Inc.*, 788 F.2d 535, 539 (9th Cir. 1986), citing *Sanders v. United States*, 373 U.S. 1, 17, 83 S.Ct. 1068, 1078, 10 L.Ed.2d 148 (1963); accord *Johnson v. Investacorp, Inc.*, No. 3-89-CV-2607-H, 1990 WL 25034 at *1 (N.D. Tex. Jan. 31, 1990). Nationwide service of process also promotes the "ends of justice" where, as here, numerous defendants reside in different states, and there likely is no alternative forum in which jurisdiction would be proper as to all defendants.

75. Not so in the lawless Florida swamp.
76. This is because crimes against vulnerable elderly adults are ignored as they are often the precursor to the capture of the vulnerable adult by the Florida Sanctioned Guardian Racket.
77. Thus incredibly without any remedy from any agency in the state of Florida, Stone was forced to file for guardianship of her mother.
78. The color of law court validated Stone's concerns and established the farce guardianship.
79. Unbeknownst to her, Stone's attorney who was a member of the Florida Sponsored Guardian Racket and acting in conspiracy, wrongfully informed Stone that she could not be her mother's guardian as Stone was living in another state at the time.
80. An illegal, void, global settlement agreement ("Settlement Agreement") that was the product of fraud in the inducement was entered into by all parties including No-Penis Raymond and Alan Stone.
81. Indeed, No-Penis Raymond himself prepared and supervised the preparation of the Settlement Agreement upon which Stone relied and thought was a legitimate document setting forth the terms whereby Stone's mother would obtain remedy.
82. The Settlement Agreement prepared by No-Penis Raymond was a bogus fabrication orchestrated by No-Penis Raymond to which No-Penis Raymond NEVER had the remotest intention to comply with.
83. The Settlement Agreement was a self serving document only for the purpose of extorting illegal fees from Stone that he was using to attach and levy upon Mother's assets to embezzle "attorney's fees" for his acts in covering up crimes committed by No-Penis Raymond's client, Alan Stone.
84. Stone entered into the Settlement Agreement in reliance on the representations therein that the reasons for which Stone filed the guardianship would be resolved and Mrs. Stone would be protected, physically, mentally, emotionally and financially from all abuse and exploitation from Alan Stone and all other parties.
85. The primary inducements for Stone to enter into the Settlement Agreement were the representations that the family would be united and disparaging remarks would not be made to Stone's mother, that the assets stolen by Alan Stone would be returned to Mrs. Stone and that Mrs. Stone would be protected from abuse.
86. However, because the only purpose of the Settlement Agreement was to bind Stone to an agreement that was unlawful as the guardianship was fraudulent at the onset as there was no medical compliance with the requirements to establish the guardianship and the guardian who was put in place was a crony of Stone's whose sole agenda was to cover up and perpetrate his crimes, the Settlement Agreement was a complete farce, scam and sham.
87. Shortly after the fraudulent guardianship was established, Mrs. Stone was emergency admitted to the hospital with 20+ life threatening conditions including
88. Instead of criminally investigating No-Penis Raymond, Alan Stone, the predator guardian and all other parties involved, Stone was preposterously falsely arrested for removing her mother from the human ownership and control of these predators under the absurd convoluted offense of "interfering" with "custody" of her own mother.²⁰

²⁰ **How They Get Away with Egregious Professional Guardianship ...**

www.case-abuse.org/professional-guardianship-fraud-by-larsen

Barbara Stone was ultimately charged with one (1) count of custodial interference with an elderly person (her Mother), a Third Degree Felony and Level 4 Offense! Barbara Stone was a former attorney with no prior criminal record.

89. Thereafter, the atrocities, corruption, void, illegal orders and crimes against humanity infested this travesty of abuse, extortion, embezzlement and war crimes taking place unabated in the corrupt Florida courts.
90. Stone reasonably attempted to set up a meeting with her sibling, Alan Stone who was responsible for this debacle to attempt to seek some semblance of protection for her mother.
91. Alan Stone had been subjected to a "heightened supervision" warning by the many firms with whom he was previously employed as he had been found to have forged client documents and engaged in financial exploitation of vulnerable adults.
92. Many of these firms had terminated Alan Stone's employment because of these crimes which were red flagged on his securities industries record reflecting his terminations and "permitted to resign" terminations.
93. In spite of the many violations of securities regulations and red flags that appeared on Alan Stone's record, No-Penis Elmore hired Alan Stone.
94. Stone went to Alan Stone's office controlled by No-Penis Elmore to discuss resolution of Mrs. Stone's abuse and exploitation.
95. No-Penis Elmore acknowledged that horrific financial exploitation against vulnerable adults.
96. No-Penis Elmore is a mandated reported of financial exploitation by state law, under securities rules and pursuant to the rules of his employee, Oppenheimer and Co. as set forth in Paragraph IV.
97. However, No-Penis Elmore refused to allow Stone access to Alan Stone and violated the law by failing to report financial exploitation of Mrs. Stone.
98. Instead, No-Penis Elmore and in collusion with No-Penis Raymond in the no law Florida courts took their game of corruption, intimidations and threats to a whole new level by orchestrating a witch hunt, vicious attacks and an illegal SLAPP lawsuit against Stone.
99. The public recognizes the extraordinary damages suffered by a party subjected to the Florida Sponsored Guardian Racket. In July, 2017, a unanimous jury in the U. S. District Court, West Palm Beach, awarded \$16,400,000 to the Estate of Oliver Wilson Bivins, Sr., and against West Palm Beach guardianship attorneys, Brian O'Connell and Ashley Crispin of the Ciklin Lubitz & O'Connell law firm. The jury found that attorneys Brian O'Connell and Ashley Crispin had breached both their professional and fiduciary duties to Bivins, an incapacitated ward of the State of Florida and had engaged in actions that increased their own attorneys' fees to the detriment of Mr. Bivins' guardianship estate. Brian O'Connell, Ashley Crispin and the Ciklin Lubitz & O'Connell law firm charged Mr. Bivins' guardianship estate over \$1,000,000 in legal fees while liquidating real estate assets at values detrimental to the estate and entered into self-serving agreements with third parties that failed to serve the best

Activist Alert: Barbara Stone in jail, to go to prison for ...

marygsykes.com/2018/01/12/activist-alert-barbara...

Activist Alert: Barbara Stone in jail, to go to prison for feeding her mother in an abusive gship in Miami Dade Fla—please write and call and demand her immediate release Posted on January 12, 2018 by jmdenison

Getting Away with Egregious Guardianship Fraud - by Michael ...

www.hospicepatients.org/professional...

Barbara Stone was ultimately charged with one count of custodial interference with an elderly person(her Mother), a Third Degree Felony and Level 4 Offense! Barbara Stone was a former attorney with no prior criminal record.

Disability Rights: When Is Taking Your Mother to Lunch a ...

www.laprogressive.com/disability-rights

Barbara Stone was on house arrest for close to a year for taking her mother, who was under guardianship in Florida, to Denny's Restaurant.

interests of the guardianship estate. During the guardianship, the court record reflects that O'Connell and Crispin also filed lawsuits against both of Bivins' children and funded the litigation through the assets of their incapacitated father.

Reference should also be made to the case of Michael James BROWN a/k/a Michael J. Brown v. STATE of Mississippi, 178 So.3d 1234 where the court found that an attorney who was attorney for guardianship, converted guardianship funds to his own use so as to support conviction for embezzlement.

IV. COURT ONE FRAUD; NEGLIGENCE; CONSPIRACY AGAINST ALL DEFENDANTS

100. The allegations in Paragraphs 1-99 are incorporated herein.
101. No-Penis Elmore was informed by Stone of the crimes being committed against Mother.
102. No-Penis Elmore was requested by Stone to schedule a meeting with Alan Stone to address the life threatening danger and embezzlement being committed against Mother as is the responsible and reasonable act of any responsible and reasonable person.
103. No-Penis Elmore acknowledged that he was well aware of these atrocities in the course and scope of his employment.
104. Instead of setting up a meeting to address abuse and exploitation atrocities against a vulnerable adult, No-Penis Elmore attacked Stone and hurled vicious allegations against her to prevent holding his employee Alan Stone accountable and to collude in the perpetration of of the Florida Sponsored Guardian Racket.
105. No-Penis Elmore had knowledge of and conspired with the acts of the Florida Sponsored Guardian Racketeers under color of state law, had the power to prevent or aid in preventing such conspiracy, and neglected or refused to prevent such conspiracy.
106. Further, No-Penis Elmore is required to report these abuses to senior officers within his company under the Code of Conduct of Defendants Oppenheimer Holdings Inc. and Oppenheimer and Co. and to the Securities and Exchange Commission under the Advisory rules of the Financial Crimes Enforcement Network (FinCEN)²¹ which provide:

- a. Paragraph 3 of the Code of Conduct provides:

COMPLIANCE WITH LAW

You must know, respect and comply with all laws, rules, and regulations applicable to the conduct of Oppenheimer's businesses in the areas in which you work. Oppenheimer actively promotes compliance with the laws, rules, and regulations that govern Oppenheimer's business. Obeying both the letter and spirit of the law is one of the foundations of Oppenheimer's ethical standards. You must follow and obey the laws of all the states and countries where we operate.

Paragraph 11 of the Code of Conduct provides:

REPORT PROBLEMS OR IRREGULARITIES

²¹ <https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2011-a003>

If you believe that you may have breached the Code or a supplemental code or guideline that applies to you, or have observed: a breach of the Code or a supplemental code or guideline by another Oppenheimer employee; or a serious weakness or deficiency in Oppenheimer's policies, procedures or controls which might enable breaches to occur or go undetected; you have a responsibility to Oppenheimer, your fellow Oppenheimer employees and yourself to report it immediately to your Manager, that employee's Manager, a Senior Officer, the Chief Compliance Officer or the General Counsel. Any Manager in receipt of such a report should immediately escalate it to one of the individuals listed in Section 14 of the Code.

b. FinCEN requires financial institutions to report Suspicious Activity Reports (SARs) describing instances of suspected elder financial exploitation.

107. No-Penis Elmore has violated the Code of Conduct of Defendants Oppenheimer Holdings Inc. and Oppenheimer and Co., the FinCEN rules and Florida and Federal Laws that mandate he report suspected financial exploitation by an Oppenheimer employee and suspected financial exploitation of an elder adult.
108. When No-Penis Elmore was requested to comply with the law and the code of Conduct of Defendant, Oppenheimer Holding, Inc. and Defendant Oppenheimer and Co., instead No-Penis Elmore threatened Stone and acted in criminal violation of the law set forth below that provides any person who fails to protect an elderly adult from harm is considered an accomplice.
109. No-Penis Elmore conspired, colluded with and is an accessory and accomplice to the Florida Sponsored Guardian Racket.
110. No-Penis Elmore who pretends that he and Oppenheimer Holdings Inc. and Oppenheimer and Co. are pillars of the community are anything but – they are the very antithesis of good neighbors and a blight on our society.
111. It is well publicized that Defendant Oppenheimer and Co. has a widespread “Culture of Corruption”.²²
112. According to the FINRA report below²³, Oppenheimer & Co. has been once again the subject of a massive regulatory fine (“FINRA Sanctions Oppenheimer & Co. \$2.9 Million for Unsuitable Sales of Non-Traditional ETFs and Related Supervisory Failures”) according to a release issued by the Financial Regulatory Authority, Inc. (“FINRA”) on June 8, 2016.
113. According to the FINRA report below,²⁴ FINRA Sanctions Oppenheimer & Co. \$3.4 Million for Reporting Violations, Failing to Comply With Discovery Obligations in Arbitrations, and Other Supervisory Failures. FINRA announced on November 17, 2016 that it has fined Oppenheimer & Co. Inc. \$1.575 million and ordered the firm to pay \$1.85 million to customers for failing to report required information to FINRA, failing to produce documents in discovery to customers who filed arbitrations, and for not applying applicable sales charge waivers to customers. FINRA found that over a span of several years, Oppenheimer failed to timely report to FINRA more than 350 required filings including securities-related regulatory

²² <http://www.investorprotection.com/blog/2016/06/09/oppenheimer-co-widespread-culture-of-corruption/>

²³ <http://www.finra.org/newsroom/2016/finra-sanctions-oppenheimer-co-29-million-unsuitable-sales-non-traditional-etfs>

²⁴ <http://www.finra.org/newsroom/2016/finra-sanctions-oppenheimer-co-34-million-reporting-violations-failing-comply>

findings, disciplinary actions taken by Oppenheimer against its employees, and settlements of securities-related arbitration and litigation claims.

114. Defendant Oppenheimer and Co. has been the subject of over a whopping 250 regulatory investigations and customer complaints. Recent examples include:

- a. In March 2019 the SEC sanctioned Oppenheimer & Company in connection to allegations it breached its fiduciary duty and provided inadequate disclosures in connection to its mutual fund share class selection processes, resulting in customers investing in mutual fund share classes accompanied by 12B-1 fees when they were eligible for share classes with lower costs. The firm was censured and ordered to pay disgorgement of more than \$3.1 million.
- b. In November 2018 the State of Nevada sanctioned the firm in connection to allegations it failed to obtain proper licensure between 2003 and 2015 and additionally that it engaged in securities-related business without first obtaining a license. The firm was ordered to pay a fine of \$8,000.
- c. In March 2018 a customer alleged the firm breached its fiduciary duty, churned investments, committed fraud, misrepresented and omitted material facts, executed unauthorized trades, made unsuitable investment recommendations, acted negligently, violated blue sky laws, and failed in its supervisory duties in connection to investments in common stock and other securities. The complaint resulted in an award to the customer of more than \$250,400.
- d. In 2017 the Chicago Board Options Exchange sanctioned the firm in connection to allegations that “in at least 1.5 million instances,” it failed to submit reportable positions to the LOPR; submitted inaccurate reports; and failed in various supervisory capacities. The firm was censured and issued a fine of \$700,000.
- e. In 2016 FINRA sanctioned Oppenheimer & Company in connection to allegations, among others, that it failed in its supervisory duties pertaining to sales charge waivers, producing certain documents to customers who had filed arbitrations, and making filings to FINRA in a timely manner. The firm was censured and issued a fine of \$1,575,000.
- f. In 2016 the State of Michigan sanctioned the firm following allegations it failed to timely submit application materials for forty representatives. The firm was issued a fine of \$900,000.
- g. In 2016 FINRA sanctioned the firm in connection to allegations it did not report “short interest positions on multiple settlement dates” and that it made inaccurate reports of short positions. The firm was censured and issued a fine of \$275,000, and undertook to revise its written supervisory procedures.
- h. In 2016 FINRA sanctioned the firm following allegations it failed in its supervisory duties regarding the sales of leveraged, inverse, and inverse-leveraged exchange-traded funds, also known as non-traditional exchange traded funds, including by failing to adequately train supervisors and representatives on a prohibition against soliciting non-traditional ETF purchases. The firm was censured and issued a fine of \$2,250,000.
- i. In 2016 the South Carolina Securities Division sanctioned the firm following allegations it failed to detect and report the activities of a former registered representative, Mark Hotton, in connection to his recommendation that a client invest in private placements. The firm was issued a fine of \$150,000.
- j. In 2016 a customer alleged the firm breached its fiduciary duty, misrepresented material facts, recommended unsuitable investments, failed in its supervisory duties, acted

negligently, executed unauthorized trades, and breached its fiduciary duty in connection to investments in exchange-traded funds, options, and structured products. The complaint resulted in an award to the customer of \$800,000.

- k. In 2016 a customer alleged the firm committed fraud, misrepresented and omitted material facts, breached its fiduciary duty, recommended unsuitable investments, failed in its supervisory duties, and acted negligently. The complaint resulted in an award to the customer of more than \$862,100.
- l. In 2015 FINRA sanctioned the firm in connection to allegations it executed customer transactions in a municipal security product "in an amount lower than the minimum denomination of the issue" and also that the firm did not fully disclose material facts regarding municipal securities transactions. The firm was censured and issued a fine of \$200,000. In 2015 the Department of the Treasury Financial Crimes Enforcement Network sanctioned the firm in connection to allegations it willfully violated the Bank Secrecy Act, including by failing to implement an effective anti-money laundering program, failing to implement an effective due diligence program for a foreign correspondent account, and failing to comply with certain notification requirements. The firm was issued a fine of \$20,000,000.

115. Oppenheimer and Co. has been the subject of a vast number of lawsuits:

- a. (Reuters) - Financial services firm Oppenheimer & Co Inc was sued on Wednesday by a gay former analyst who claimed he suffered retaliation and was eventually fired for taking parental and medical leave. In the complaint filed in federal court in Manhattan, Hoai Ngo accused the firm, a subsidiary of Oppenheimer Holdings Inc, of violating state and federal anti-discrimination laws. Ngo is seeking reinstatement at the company and unspecified monetary damages.²⁵
- b. Oppenheimer Funds, Inc RMUNX Securities Fraud
www.bigclassaction.com/lawsuit/oppenheimer-funds... A class action lawsuit has been filed in the United States District Court for the Eastern District of New York against Oppenheimer Funds, Inc. ("Oppenheimer") on behalf of purchasers of the Rochester Fund Municipals ("Rochester" or the "Fund") (NASDAQ: RMUNX) (NASDAQ: RMUBX) (NASDAQ: RMUCX) from February 26, 2006 through October 21, 2008 (the "Class Period").
- c. Oppenheimer Class Action Lawsuit Filed Over Champion Income ...
www.aboutlawsuits.com/oppenheimer-class-action... The Oppenheimer Fund lawsuit was filed on February 13, 2009, in the United States District Court for the Southern District of New York seeking to represent all shareholders as a class.
- d. Oppenheimer Lawsuit Filed by Oregon Over Mutual Fund Losses ...
www.aboutlawsuits.com/oppenheimer-lawsuit-filed...
- e. The State of Oregon has filed a \$36.2 million lawsuit against Oppenheimer Funds, Inc., seeking to recover losses caused by the collapse of the Oppenheimer Core Bond Fund.
Lawsuit against Oppenheimer Alleges Stock Brokers May be ...
- f. www.prweb.com/releases/2006/05/prweb391400.htm
 Lawsuit against Oppenheimer Alleges Stock Brokers May be Entitled to Overtime Pay
 Share Article
 Lawsuits force changes as securities firms pay major settlements for claiming that stock brokers are exempt from overtime wages.
- g. Lawsuit against Oppenheimer alleges Stock Brokers may be ...

²⁵ <https://news.yahoo.com/former-analyst-sues-oppenheimer-alleging-discrimination-234659444--sector.html>

www.lawyersandsettlements.com/press_releases/...

Lawsuit against Oppenheimer alleges Stock Brokers may be entitled to Overtime Pay. Lawsuits force changes as securities firms pay major settlements for claiming that stock brokers are exempt from ...

h. Oppenheimer Champion Income Fund Class Action Lawsuit Settlement

classactionlawsuitsinthenews.com/class-action-lawsuit...

Oppenheimer Champion Income Fund Class Action Lawsuit Settlement on July 26, 2011 If You Purchased Or Otherwise Acquired Shares Of The Oppenheimer Champion Income Fund (The "Champion Income Fund"), During The Period From January 1, 2006 Through December 31, 2008, Inclusive, You Could Receive A Payment From A Class Action Settlement.

i. Commerical Litigation, Class Action Lawsuits, Oppenheimer ...

216.197.104.77/pages/oppenheimer.asp OPPENHEIMER ROCHESTER NATIONAL MUNICIPALS FUND SECURITIES CLASS ACTION Kantrowitz, Goldhamer & Graifman, P.C. Files Class Action Lawsuit Against OPPENHEIMER ROCHESTER NATIONAL MUNICIPALS FUND (NASDAQ: ORNAX, ORNBX, ORNCX) March 30, 2009 (Chestnut Ridge, New York) –

j. US: EEOC Sues Oppenheimer For Sex Discrimination - corpwatch.org

corpwatch.org/article/us-eeoc-sues-oppenheimer... The U.S. Equal Employment Opportunity Commission said Thursday that it has filed a sex-discrimination lawsuit against Oppenheimer & Co. Inc. in federal court in Manhattan, alleging discriminatory behavior in its hiring practices.

k. classactionlawsuitsinthenews.com/class-action-lawsuit...

Oppenheimer Champion Income Fund Class Action Lawsuit Settlement on July 26, 2011 If You Purchased Or Otherwise Acquired Shares Of The Oppenheimer Champion Income Fund (The "Champion Income Fund"), During The Period From January 1, 2006 Through December 31, 2008, Inclusive, You Could Receive A Payment From A Class Action Settlement.

l. Oppenheimer Funds Settles Fund Case for \$100 Million ...

www.financial-planning.com/news/oppenheimerfunds... OppenheimerFunds is paying \$100 million to settle a class-action lawsuit against two of its funds, the Oppenheimer Champion and the Oppenheimer Core Bond funds. The Denver U.S. District Court will ...

m. Oppenheimer Core Bond Fund Class Action Lawsuit Settlement

classactionlawsuitsinthenews.com/class-action-lawsuit... A class action settlement has been reached in a class action lawsuit against OppenheimerFunds, Inc. ("OFI"), Oppenheimer Funds Distributor, Inc., Oppenheimer Integrity Funds ("OIF") and others (collectively "Defendants") in the United States District Court for the District of Colorado (styled In re: Core Bond Fund, Civil Class Action ...

n. Oregon's Attorney General Files \$36 Million Lawsuit Against ...

www.investorlawyers.com/blog/oregons_attorney... Oregon's Attorney General Files \$36 Million Lawsuit Against OppenheimerFunds April 21, 2009 Financial Firms, Oppenheimer, Securities Fraud SSEK Law Last week, the Oregon's Attorney General sued OppenheimerFunds Inc. for allegedly mismanaging the state's 529 College Savings Plan when it recommended a bond that took risks that were not in ...

o. US: EEOC Sues Oppenheimer For Sex Discrimination - corpwatch.org

corpwatch.org/article/us-eeoc-sues-oppenheimer... The U.S. Equal Employment Opportunity Commission said Thursday that it has filed a sex-discrimination lawsuit against Oppenheimer & Co. Inc. in federal court in Manhattan, alleging discriminatory behavior in its hiring practices.

o. Silver Law Group is Investigating Claims Against Oppenheimer ...

www.silverlaw.com/blog/silver-law-group... Securities Arbitration Lawyers Blog Published on: January 9, 2018 Silver Law Group is Investigating Claims Against Oppenheimer & Co Broker David Krumrey for Unsuitable Trading Activity

116. The Securities and Exchange Commission has been blasted for turning a blind eye to failing to fine Oppenheimer and Co. for misconduct ²⁶. Two members of the Securities and Exchange Commission blasted the agency's decision to spare Oppenheimer Holdings Inc. from additional sanctions related to a recent settlement, saying regulators were turning a "blind eye" to the investment bank's pattern of misconduct. SEC Commissioners Luis Aguilar and Kara Stein, both Democrats, said they opposed a waiver of a penalty that would have barred Oppenheimer from raising money for private firms and hedge funds after the company admitted last week to improperly selling billions of shares of penny stocks. "These violations are just the most recent chapter in a long and unfortunate history of regulatory failures, some more significant than others, but cumulatively indicative of a wholly failed compliance culture," Mr. Aguilar and Ms. Stein wrote in a statement released Wednesday.
117. It is well publicized that Defendant Oppenheimer and Co. has a pattern and history of hiring brokers with a background of misconduct. ²⁷ Moreover, according to a report, ²⁸ prior offenders are five times more likely to repeat their misconduct as compared to an average adviser. Approximately **one-third of advisers** with misconduct reports are repeat offenders.
 - a. A cursory review of the FINRA BrokerCheck report for Oppenheimer & Co. indicates that the firm has now been the subject of at least 83 regulatory enforcement proceedings and hundreds of customer-initiated arbitration proceedings.
 - b. Of equal and perhaps greater importance, a recent academic study ("The Market for Financial Adviser Misconduct") found that more than one in seven financial advisers at Oppenheimer & Co. "have engaged in misconduct in their past" and "almost one in five financial advisers at Oppenheimer & Co. have been disciplined for misconduct in the past."
118. It is well publicized that Defendant Oppenheimer has a pattern and history of failing to supervise its brokers and investment advisers.
 - b. According to the FINRA report below, ²⁹ FINRA Sanctions Oppenheimer & Co. \$3.75 Million for Supervisory Failures. FINRA announced on March 26, 2015 that it has fined Oppenheimer & Co. Inc. \$2.5 million and ordered the firm to pay restitution of \$1.25 million for failing to supervise Mark Hotton, a former Oppenheimer broker who stole money from his customers and excessively traded their brokerage accounts. FINRA permanently barred Mark Hotton from the securities industry in August 2013.

Oppenheimer failed to respond to "red flags" in correspondence and wire transfer requests demonstrating that Hotton was wiring funds from Oppenheimer customer accounts to

²⁶ <http://brokerdealer.com/blog/tag/oppenheimer-co/>

²⁷ <http://www.investorprotection.com/blog/2016/06/09/oppenheimer-co-widespread-culture-of-corruption/>

²⁸ <https://www.newyorksecuritieslawyersblog.com/new-study-reveals-7-financial-advisers-guilty-misconduct-safe/>

²⁹ <https://www.finra.org/newsroom/2015/finra-sanctions-oppenheimer-co-375-million-supervisory-failures>

entities that he owned or controlled. This allowed Hotton to transfer more than \$2.9 million from those customers' accounts. Finally, Oppenheimer failed to adequately supervise Hotton's trading of his customers' accounts despite the fact Oppenheimer's surveillance analysts detected Hotton was trading the accounts at presumptively excessive levels. In addition, FINRA found that Oppenheimer failed to make more than 300 required filings to FINRA about some of its brokers in a timely manner.

Oppenheimer has paid more than \$6 million to resolve customer arbitration claims related to its supervision of Hotton. FINRA ordered \$1.25 million in restitution to 22 additional customers who suffered losses but had not filed arbitration claims.

- c. The Securities and Exchange Commission announced in June, 2015 that three former employees of Oppenheimer & Co. Inc. have agreed to settle charges stemming from the unregistered sales of billions of shares of penny stocks on behalf of a customer. The actions involve a portion of the conduct announced in January in a settled enforcement action against Oppenheimer in which the broker-dealer admitted wrongdoing and paid \$20 million to the SEC and the Treasury Department's Financial Crimes Enforcement Network.³⁰

The actions were instituted against Scott A. Eisler, a former registered representative at Oppenheimer's branch in Boca Raton, Fla., his former branch manager and supervisor Arthur W. Lewis, and Lewis's supervisor Robert Okin, a former head of Oppenheimer's Private Client Division.

- d. Is Oppenheimer now misleading itself on fraud?³¹ August 21, 2013. FORTUNE — More than a year ago, we reported on how a private equity unit of Oppenheimer & Co. had inflated the valuation of one of its investments, in order to help market a new fund. The SEC later charged Oppenheimer with misleading investors, and the firm agreed to pay a penalty, return money to investors and be censured. What it didn't do, however, was cut ties with Brian Williamson, the private equity executive who allegedly sat at the center of the scandal. Instead, Oppenheimer continued to let him manage Oppenheimer assets through an independent platform. Moreover, it does not appear to have severed its many financial ties to an independent private equity group (Roc Resources) than Williamson formed after spinning out of Oppenheimer.

The SEC yesterday charged Williamson with "misleading investors about the valuation and performance" of a fund-of-funds, but there was no simultaneous settlement. What on earth is Oppenheimer thinking letting the guy manage client assets? Williamson might be proclaiming his innocence – as is his right – but Oppenheimer copped to the fraud in its earlier settlement. Does Oppenheimer believe that magical fairies in its desk drawers misled investors? Or that it was some weird computer glitch?

³⁰ <https://www.sec.gov/news/pressrelease/2015-153.html>

³¹ <http://fortune.com/2013/08/21/is-oppenheimer-now-misleading-itself-on-fraud/>

- e. Ex-Morgan Stanley Broker Who Moved to Oppenheimer & Co Gets Barred by Finra. March, 2019. Industry organization Finra has barred a former Morgan Stanley broker for refusing to appear for testimony for its investigation of his departure, according to the self-regulator. The wirehouse permitted Raymond Keith Malicki to voluntarily resign in July, following allegations of “access to, and conducting transactions in, a client’s account at a third party financial institution,” according to his BrokerCheck profile. In August, Malicki associated with Oppenheimer & Co., where apparently he is still currently employed, according to both his BrokerCheck file and a letter of acceptance, waiver and consent published by Finra.

The month Malicki was hired, Oppenheimer filed an amendment to his Form U-4 to disclose the allegations from Morgan Stanley related to his resignation, the regulator says. Last month, Finra requested Malicki appear for testimony related to the amendment but Malicki refused, according to the letter of consent. He agreed to the bar without admitting or denying Finra’s findings, the regulator says.³²

- 114. Oppenheimer Holdings, Inc. and Oppenheimer and Co. perpetrate their culture of corruption and put the public in danger by hiring fraudsters and shysters to defraud and misappropriate the assets of investors in order to inflate the holdings of their companies.
- 115. The identical culture of corruption was apparent in their hiring of Alan Stone who fits into this exact pattern of corrupt hires:
 - a. Alan Stone deals almost exclusively with elder or disabled adults who are the most vulnerable to exploitation.
 - b. Alan Stone was terminated from several brokerage companies for forging the signature of elderly clients and was “permitted to resign.”
 - c. This repeated pattern of “permitted to resign” is in and of itself a red flag warning of corruption.
 - d. A single instance of a broker’s “agreement to resign” in a FINRA filing is should raise concerns for brokerage companies that an exhaustive background investigation is required; multiple instances and a repeated pattern of an “agreement to resign” is in and of itself a red flag warning of corruption.
 - e. Moreover, a review of Alan Stone’s background reflects that he was put on heightened supervision by his prior firm.
 - f. Moreover, Alan Stone has been associated with more than a dozen brokerage companies, many for a short period of time, raising more red flags of suspicious activity.
 - g. Alan Stone’s documented embezzlement of \$700,000 of Mother’s assets by forged checks and secret wire transfers while he was with a prior brokerage firm is evidenced in the probate court record.
 - h. No-Penis Elmore imposed himself into this matter for the purpose of attacking Stone.

³² Separately, the SEC has obtained a federal court order judgment against a former Wells Fargo Advisors representative. In September, 2018 the SEC filed a complaint against John Gregory Schmidt alleging he had sold securities belonging to his brokerage clients and secretly moved more than \$1 million in proceeds to pay back other customers. Schmidt agreed to pay \$235,614 in disgorgement and \$35,049 in interest, and a penalty of \$864,301. In January, Schmidt was charged with 124 counts of forgery, two counts of theft from an elderly or disabled adult, and two counts of fraud. Finra had barred Schmidt in March 2018 for failing to respond to request for information. He had been registered with Wells Fargo until the firm terminated him over allegations of unauthorized transactions between client accounts.

- i. No-Penis Elmore is either inept by ignoring the documented extortion and embezzlement by Alan Stone of Mother or No-Penis Elmore is corruptly covering up these financial crimes of Alan Stone.
 - j. Alan Stone and Defendant No-Penis Elmore are engaged in the Florida Sponsored Guardian Racket in the course and scope of their employment with Defendants Oppenheimer Holding, Inc and Oppenheimer and Co., a subsidiary of Oppenheimer Holding, Inc. and its investment advisory firm who are responsible and liable.
 - k. Defendants Oppenheimer Holdings, Inc. and Oppenheimer and Co. have violated FINRA rules, perpetrated their culture of corruption and put the investment public in danger by failing to supervise Alan Stone.
116. Wherefore, Stone seeks compensatory, punitive and treble damages and attorney's fees and costs against all Defendants.

**V. COUNT TWO
CONSPIRACY TO INTERFERE WITH RIGHTS
UNDER 18 U.S.C. § 1985; AND
FAILURE TO PROTECT PLAINTIFF UNDER 42 U.S.C. § 1986
AGAINST ALL DEFENDANTS**

117. The provisions of Paragraphs 1-116 are incorporated herein.
118. Defendants Oppenheimer Holdings, Inc.; Oppenheimer and Co. ; and No-Penis Elmore had a policy, practice, or custom of neglecting to prevent 42 U.S.C.A. § 1985³³ violations by its agents or employees.

³³ 42 U.S. Code § 1985. Conspiracy to interfere with civil rights

(2) OBSTRUCTING JUSTICE; INTIMIDATING PARTY, WITNESS, OR JUROR

If two or more persons in any State or Territory conspire to deter, by force, intimidation, or threat, any party or witness in any court of the United States from attending such court, or from testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party or witness in his person or property on account of his having so attended or testified, or to influence the verdict, presentment, or indictment of any grand or petit juror in any such court, or to injure such juror in his person or property on account of any verdict, presentment, or indictment lawfully assented to by him, or of his being or having been such juror; or if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws;

(3) DEPRIVING PERSONS OF RIGHTS OR PRIVILEGES

If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United

119. Defendants Oppenheimer Holdings, Inc.; Oppenheimer and Co.; and No-Penis Elmore have created an atmosphere of lawlessness, and have developed and maintained a pattern and practice of lawlessness and willful and deliberate indifference to the constitutional rights of Plaintiff.
120. No-Penis Elmore has acted in conspiracy with No-Penis Raymond to maliciously mastermind and conspire in a scheme to deprive Stone of her constitutionally protected rights including her First Amendment right to free speech and to life, liberty and property.
121. The protections under the Constitution include:

AMENDMENT I: Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances. The United States Supreme Court held in *NAACP v. Alabama* (1958) that freedom of association is an essential part of freedom of speech because, in many cases, people can engage in effective speech only when they join with others.

AMENDMENT 14: Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws

PRIVACY PROTECTION: The Constitution provides a second type of privacy protection. This protection is not explicit, since no clause in the Constitution refers expressly to privacy. But the courts have repeatedly recognized that the Constitution does expressly protect certain *aspects of privacy* under the Bill of Rights. These include a right to privacy of belief as guaranteed under the First Amendment and a right to privacy within our homes as guaranteed under the Third Amendment. But perhaps the most concrete of the privacy rights suggested by the Bill of Rights are those covered by the Fourth Amendment—the right to be secure in our persons and property against unreasonable searches and seizures.

The Fourth Amendment, specifies that "no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized." The amendment's first clause spoke to a more general "right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures." This more general right was tied to an ancient British legal principle guaranteeing personal security in our homes. The belief that "every man's home is his castle" was firmly entrenched in British law.

In *Katz v. United States*, the Court concluded that the Fourth Amendment protects people, not just places; the amendment's intent was not just to protect our homes and property from government's unreasonable encroachment, but also people and the privacy that they have come to expect in certain places and situations. More precisely, the Court

States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.

held that when and where there is a reasonable expectation of privacy, that privacy must be respected. It cannot be violated unreasonably; authorities may encroach upon it only with a warrant or by meeting one of the exceptions that authorize a warrantless search.

Consistent with the unequivocal words of the statute, the Supreme Court a Plaintiff must prove only two elements to establish a prima facie case under § 1983: 1) defendant acted under color of state law, and 2) defendant's conduct caused Counter-Plaintiff to be deprived of a right protected by the Constitution. The legislative history of § 1983 confirms Congress intended the statute to generously afford relief to persons injured by officials

"Nor shall private property be taken for public use, without just compensation." U.S. CONST., amend. V. 42 U.S.C. § 1983 (2006). See *Daniels v. Williams*, 474 U.S. 327 (1986) (holding Section 1983 does not require Counter-Plaintiffs to prove culpability beyond that necessary to show a constitutional violation).

122. Moreover, Defendants are criminally liable for their malicious, wanton and intentional acts to deprive Stone of her Constitutional rights under 18 U.S.C. § 241³⁴ and 18 U.S.C § 242.³⁵ As set forth herein, Stone seeks that this Court issue an order to the F.B.I. to require their criminal investigation into the acts of Defendants.
123. As a direct and proximate result of the Defendants' actions, Stone and her interests were harmed and Stone was deprived of due process, rights under the Constitution, equal protection of the laws and/or of equal privileges and immunities under the laws.
124. As a direct and proximate result of the Defendants' actions, Stone has suffered loss of reputation, and other non-economic harm including emotional and mental distress, degradation, embarrassment, and humiliation for which Plaintiffs seeks compensation in an amount to be determined at trial by a jury.
125. As a direct and proximate result of the Defendants' violation of Plaintiff's constitutionally guaranteed rights and actions/inactions alleged in this Complaint, Plaintiff has suffered severe economic loss in the form of loss of job and livelihood, investment and loss of future business, in an amount to be proven at trial, plus interest.
126. The Defendants' actions were intentional, willful, and with reckless disregard to Plaintiff's rights. Such conduct exceeded the bounds of social toleration and is of the type that punitive

³⁴ 18 U.S. Code § 241. Conspiracy against rights

If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or

If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured—

They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.

³⁵ 18 U.S.C § 242 provides as follow:

"Whoever, under color of any law, statute, ordinance, regulation or custom willfully subjects any person in any State, Territory, Commonwealth, Possession or District to the deprivation of any rights, privileges or immunities secured or protected by the Constitution or law of the United States or to different punishments, pains or penalties on account of such person being an alien, or by reason of his color or race than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year or both; ..."

damages deter. Plaintiff requests an award of punitive damages in an amount to be determined at trial by a jury.

127. Plaintiff is entitled to reasonable attorneys' fees and costs incurred, including expert witness fees, pursuant to 42 U.S.C.A. § 1988.

**VI. COUNT THREE
ABUSE OF PROCESS AND MALICIOUS PROSECUTION
AGAINST ALL DEFENDANTS**

128. The allegations in Paragraphs 1 – 127 are incorporated herein.
129. This Count asserts a claim for malicious prosecution and deprivation of constitutional rights under color of law pursuant to 42 U.S.C. § 1983.
130. Malicious prosecution tort law seeks to protect against unjustifiable and unreasonable litigation. It requires a showing that the action was brought to harm the defendant or another improper motive. Malice is generally a wrongful intent, typically based in dislike of or animosity toward a person.
131. This may be shown by, among others, sloppy legal or factual research, disparaging comments about the original defendant, a great imbalance in power between the parties, or an apparent desire by the original plaintiff to intimidate or punish the original defendant.
132. It is obvious to any third party that No-Penis Raymond is spewing his hatred of Stone into a lawsuit he filed against Stone, using No-Penis Elmore for the purpose of seeking “revenge” on Stone.
133. No-Penis Raymond has a personal vendetta against Stone as a result of Stone’s purported exposure of No-Penis Raymond’s criminal acts against Stone’s mother being exposed, thereby preventing No-Penis Raymond from perpetrating these crimes on others.
134. No-Penis Raymond’s personal vengeance against Stone by using No-Penis Elmore as a front to sue Stone, using poisonous, defamatory words and attacks make it flagrantly apparent that No-Penis Elmore’s fraudulent lawsuit is a deeply personal matter to No-Penis Raymond and there is an unethical and criminal conflict of interest in bringing the lawsuit.
135. Ironically No-Penis Elmore is also being scammed by No-Penis Raymond as the lawsuit by No-Penis Elmore filed by No-Penis Raymond is intended by him to benefit himself by carrying his personal vendetta against Stone such that taking fees from No-Penis Elmore is a conflict of interest to his own client.
136. Moreover, Nelson Mullins Broad and Cassel Raymond is using No-Penis Elmore’s matter to exploit Stone’s mother’s assets as he is illegally using the probate court to adjudicate matters relating to No-Penis Elmore.
137. Moreover, No-Penis Raymond has a fiduciary obligation not only to Mrs. Mother but also to Stone as she is a beneficiary.
138. It is obvious to any third party that No-Penis Raymond has orchestrated and is using a fake, fraudulent “guardianship” through a fraudulent, illegal Settlement Agreement to enlist crony racketeers like No-Penis into his racket to extort and exploit Stone and her mother.
139. The legal and judicial systems have been grossly abused to damage Stone in a gross perversion of process orchestrated by No-Penis Raymond and No-Penis Elmore.

140. No-Penis Raymond and No-Penis Elmore fall squarely within the definition of a predator.³⁶
141. As a direct and proximate result of the Defendants' actions, Stone has suffered loss of reputation, and other non-economic harm including emotional and mental distress, degradation, embarrassment, and humiliation for which Plaintiffs seeks compensation in an amount to be determined at trial by a jury.
142. As a direct and proximate result of the Defendants' violation of Plaintiff's constitutionally guaranteed rights and actions/inactions alleged in this Complaint, Plaintiff has suffered severe economic loss in the form of loss of job and livelihood, investment and loss of future business, in an amount to be proven at trial, plus interest.
143. The Defendants' actions were intentional, willful, and with reckless disregard to Plaintiff's rights. Such conduct exceeded the bounds of social toleration and is of the type that punitive damages deter. Plaintiff requests an award of punitive damages in an amount to be determined at trial by a jury.
144. Plaintiff is entitled to reasonable attorneys' fees and costs incurred, including expert witness fees, pursuant to 42 U.S.C.A. § 1988.

VII. COUNT FOUR
INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS;
EMOTIONAL DISTRESS FROM LOSS OF RIGHT OF ASSOCIATION;
MENTAL ANGUISH FROM CRUELTY;
CONSPIRACY TO HARASS, BULLY, DEFAME;
TORTIOUS INTERFERENCE WITH FAMILY ASSOCIATION;
INVASION OF PRIVACY;
INTERFERENCE WITH ACCESS TO THE COURT;
INTERFERENCE WITH AN EXPECTANCY;
TORTIOUS INTERFERENCE WITH FAMILY RELATIONSHIP;
FALSE LIGHT; EXTORTION
AGAINST DEFENDANT NO-PENIS ELMORE

145. The allegations in Paragraphs 1 – 144 are incorporated herein.
146. This is a count against No-Penis Defendant for injury by virtue of the intentional, extreme and outrageous nature of his conduct causing severe mental distress and deprivation of rights.
147. In performing each acts ascribed to them Defendants intended to cause or acted in reckless disregard of the likelihood of causing and did cause Stone extreme emotional distress and trauma.
148. As an actual and foreseeable result of the actions of each Guardian Atrocities Perpetrator and No-Penis Elmore, Stone has suffered severe emotional distress and resulting loss to business opportunities and income.
149. No-Penis Elmore and No-Penis Raymond have deviously made it virtually impossible to Stone to retain counsel.

³⁶ Predator as defined in the American Heritage® Dictionary of the English Language, Fifth Edition:

1. An organism that lives by preying on other organisms.
2. A person or group that robs, victimizes, or exploits others for gain.

150. No-Penis Raymond has colluded openly with Stone's counsel and has been involved with secretive business dealings with Stone's counsel unbeknownst to her.
151. No-Penis Raymond conjured devious insidious attacks on Stone in the presence of her counsel to undermine her.
152. These retaliatory acts to deprive Stone of counsel and conspire with Stone's counsel is evidenced by an affidavit from an attorney who Stone had sought to retain and who was viciously threatened with disbarred if she acted as Stone's counsel, depriving Stone of access to the court.
153. No-Penis Raymond and No-Penis Elmore have defamed, impugned and maligned Stone and painted her in a false light.
154. Stone has been illegally and cruelly separated from her mother, a vulnerable frail adult who has been cruelly lead to believe her daughter has abandoned her.
155. No-Penis Raymond and No-Penis Elmore have poisoned Mrs. Stone against her daughter, Barbara with vicious and malicious lies.
156. Stone has been painted in a false light in order to orchestrate litigation in order to extort Stone and her mother.
157. Stone has been subjected to harassment, retaliation and false accusations of far-fetched crimes by No-Penis in order to cause her arrest.
158. Plaintiffs suffered grave emotional distress and trauma as they are forced to watch in horror as their loved ones are viciously abused in open sight of all Florida and Federal agencies who refuse to provide relief.
159. As a direct and proximate result of No-Penis Elmore and No-Penis Raymond's acts, Stone has suffered loss of reputation, and other harm including emotional and mental distress, degradation, embarrassment, and humiliation for which Stone seeks compensation in an amount to be determined at trial by a jury.
160. As a direct and proximate result of the Defendants' violation of Stone's constitutionally guaranteed rights and actions/inactions alleged in this Complaint, Stone has suffered severe economic loss in the form of loss of job and livelihood, investment and loss of future business, in an amount to be proven at trial, plus interest.
161. The Defendants' actions were intentional, willful, and with reckless disregard to Stone's rights. Such conduct exceeded the bounds of social toleration and is of the type that punitive damages deter. Stone requests an award of punitive damages in an amount to be determined at trial by a jury.
162. Stone is entitled to reasonable attorneys' fees and costs incurred, including expert witness fees, pursuant to 42 U.S.C.A. § 1988.

**VIII. COUNT FIVE
BREACH OF FIDUCIARY DUTIES
AGAINST DEFENDANT
NO-PENIS ELMORE**

163. The allegations in Paragraphs 1 – 162 are incorporated herein.
164. Alan Stone, an employee of Defendant under the direct control of No-Penis Elmore is acting in an illegal fiduciary capacity with regard to Mrs. Stone's assets as he controls the activities of the illegal guardian who he brought in to cover up his financial crimes and crimes of abuse against Mrs. Stone.

165. Alan Stone and by extension, No-Penis Elmore has a fiduciary duty to both Mrs. Stone and to Stone as a beneficiary to protect them from the criminal acts of Alan Stone of which he is aware.
166. No-Penis Elmore is an accomplice to Alan Stone's breach of fiduciary duty to Mrs. Stone and Stone.
167. No-Penis Elmore has profited from his relationship with Alan Stone with regard to any funds that are unlawfully being held with his firm.
168. The conduct of No-Penis Elmore is constructive fraud as it is based on acts, omissions or concealments considered fraudulent and for which he obtained an advantage and requires redress. Such conduct is analogous to legal malpractice.
169. Wherefore, Stone seeks compensatory and punitive damages and reasonable attorneys' fees and costs incurred, including expert witness fees, pursuant to 42 U.S.C.A. § 1988.

**IX. COUNT SIX
RICO VIOLATIONS UNDER 18 U.S.C. 96
RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS;
AND CONSPIRACY TO COMMIT RACKETEERING
AGAINST NO-PENIS ELMORE**

170. The allegations in Paragraphs 1 – 169 are incorporated herein.
171. The assets of Mrs. Stone are prohibited under the Settlement Agreement to be held or invested by any firm in which Alan Stone is involved.
172. Under the Settlement Agreement, Alan Stone was ordered to provide restitution to Mrs. Stone and return the assets he stole and embezzled from her.
173. No-Penis Elmore is harboring Alan Stone who is holding the assets he embezzled from Mrs. Stone and opening illegal accounts which accounts and assets may be under the control of No-Penis Elmore.
174. No-Penis Elmore has become an operative in the RICO enterprise being run by the Florida Sponsored Guardian Racket by knowingly retaining No-Penis Raymond to the exclusion of any other attorney as No-Penis Raymond was known to him to be part and parcel of the Florida Sponsored Guardian Racket and who had masterminded a platform to perpetrate vicious attacks against Stone in order to cover up and divert from his collusion and conspiracy in the Florida Sponsored Guardian Racket.
175. No-Penis Elmore thereafter retained No-Penis Raymond, a known operative in the Florida Sponsored Guardian Racket to front No-Penis Elmore's vicious fraudulent attacks on Stone.
176. No-Penis Elmore has established his own criminal racket he is running through Oppenheimer Holdings Inc. and Oppenheimer and Co in collusion with Alan Stone to cover up his conspiracy and collusion with the Florida Sponsored Guardian Racket.
177. Wherefore Stone seeks compensatory, punitive and treble damages and attorney's fees and costs against No-Penis Elmore.

X. COUNT SEVEN
RICO VIOLATIONS UNDER 18 U.S.C. 96
RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS; AND
CONSPIRACY TO COMMIT RACKETEERING
AGAINST ALL DEFENDANTS

178. The allegations set forth in Paragraphs 1-177 are incorporated herein.
179. The racketeering acts of the Florida Sanctioned Guardian Racket are a well known Florida phenomenon.
180. Former Senator Nancy Detert has called the Florida Sanctioned Guardian Racketeers running this industry “cockroaches”³⁷
181. John Pacenti of the Palm Beach Post and other reporters have written articles exposing case after case of chilling hair raising stories about the predatory tactics³⁸ perpetrated by Florida

³⁷<https://miami.cbslocal.com/2015/03/12/bill-seeks-to-stop-cockroaches-from-preying-on-seniors/>

³⁸ Florida: The Judge’s wife, a frequent court-appointed guardian

aaapg.net/florida-the-judges-wife-a-frequent...

As the wife of Palm Beach County Circuit Judge Martin Colin, Savitt wields power in her husband’s Guardianship Division, where guardians are appointed to take over the lives of seniors no longer able to care for themselves. Fees for guardians and their attorneys are paid from the assets of their elderly wards and approved by the court.

This judge’s household benefits from frail seniors’ money

www.mypalmbeachpost.com/news/religion/this-judge...

The savings of incapacitated seniors flow into the household of Palm Beach County Circuit Judge Martin Colin. This occurs courtesy of Colin’s wife — Elizabeth “Betsy” Savitt. She serves as ...

Florida: Case after case of abuse and criminality in Palm ...

aaapg.net/case-after-case-of-abuse-and...

The senior’s former attorneys also question whether Savitt’s husband, Judge Colin, had anything to do with her getting the appointment. He was initially assigned the case before it was given to another judge, who appointed Savitt. At the time, Colin was also the judge presiding over the probate case for Berkowitz’s late husband, Jerry.

Judge Corruption - Jason Halle

jasonhalle.com/2016/02/02/judge-corruption

In an effort to shed more light on the Judge corruption, inappropriate and distasteful behavior going on in the South County Courthouse of Palm Beach County, I wrote a letter to the Honorable Judge Colbath on January 25, 2016 and sent a copy to John Pacenti at the Palm Beach Post.

May 13, 2016 – Living wills of Incapacitated seniors ignored ...

scannedretina.com/2016/05/15/may-13-2016-living...

The Palm Beach Post in its series, Guardianships: A Broken Trust, revealed the incestuous nature of guardianship and how money from the savings of incapacitated seniors flowed into the household of Circuit Judge Martin Colin through his wife, professional guardian Elizabeth “Betsy” Savitt.

David E. French - Jason Halle - Investigative Blogger

jasonhalle.com/category/david-e-french

Investigating Judge David E. French and Judge Martin Colin in the Palm Beach Probate Court. Jason Halle was a qualified beneficiary of the Edward Halle Trust and a qualified distributee as well. The trigger for disbursement and termination of the Edward Halle Trust occurred in August of 2007.

Report: Savitt involved with ‘corruption, collusion of judges ...

www.palmbeachpost.com/news/20180910/report...

“Corruption and collusion of judges and lawyers in Delray Beach for financial gain” centered around dubious professional guardian Elizabeth “Betsy” Savitt and her husband, former Circuit Judge ...

David E. French - Jason Halle - Investigative Blogger

jasonhalle.com/tag/david-e-french

Sanctioned Guardian Racket that any reasonable sane person would find to be the product of deranged minds and the stuff of a macabre mystery writer.

182. These stories exposing the racketeering activities include case after case of atrocities and exploitation³⁹ including:

- a. **Skender Hoti and his mother Gyndolyn Batson who is now deceased who are** featured in a series of articles in the footnotes below.⁴⁰ Mrs. Batson was illegally forced into guardianship controlled by the guardian wife of the color of law judge illegally presided over the matter. Hoti's home was vandalized by this judge's "guardian" wife who used a sledgehammer to break into his home and loot all of his possessions and those of his mother. Repeated police and F.B.I. reports resulted in nothing as they are conspirators in the Florida Sponsored Guardian Racket.
- b. **Patty Reid and her son Landon Reid.** Landon Reid is a beautiful black man who was born blind and his mother obtained a medical settlement. Because there was medical settlement money, Landon was captured and forcibly disappeared in a "guardianship" in Broward County where these assets are being embezzled. Patty Reid, like Stone, both of

If Judge David E. French had allowed such a hearing or granted the motion for relief both John G. White, III and Michael J. Napoleone from the law firm of Richman Greer could have been brought up on charges of misconduct. Judge David E. French was not going to let that happen to his colleagues.

Report: Savitt involved with 'corruption, collusion of judges'

nasga-stopguardianabuse.blogspot.com/2018/09/...

Marx, French and Scher, along with Circuit Judges Howard Coates and Jessica Ticktin approved \$21,500 in retainers taken by Savitt from her wards' banking accounts that the report said violates Florida guardianship law. Circuit Judge Peter Blanc, the chief judge in 2012, received the initial verbal report finding a conflict of interest.

Chief judge thwarts guardian's effort to move cases - News ...

www.palmbeachpost.com/news/local/chief-judge...

A year ago, the chief judge booted the cases of controversial guardian Elizabeth "Betsy" Savitt out of the South County Courthouse over apparent concerns about favoritism and conflict of interest ...

³⁹ Guardianship registration revoked for Betsy Savitt, wife of ...

www.palmbeachpost.com/news/20190321/guardianship...

The state on Thursday revoked the registration of professional guardian Elizabeth "Betsy" Savitt, the wife of former guardianship Judge Martin Colin and the subject of criminal and ...

Jury hits lawyers with \$16.4M for doing senior wrong in guardianship ...

<https://www.palmbeachpost.com/...guardianship/6CnikAZ7x3K9z960lz09BN/>

Aug 4, 2017 - Advocates for *guardianship* reform clamored in vain for years that Florida's system failed to properly ... By John Pacenti ..., ...

Palm Beach Court Rejects Efforts To Sue Professional Guardian | Fort ...

<https://www.kuhnlegal.com/palm-beach-court-rejects-efforts-to-sue-professional-guar...>

Nov 7, 2017 - Despite evidence of *guardianship* fraud and financial elder *abuse*, the Palm ... John Pacenti, "Ruling ends effort to find \$400K missing in Savitt ...

⁴⁰ Professional guardian's lawyer empties man's home - News - The ...

[https://www.palmbeachpost.com/article/20150403/NEWS/812064418Apr 3, 2015 - One afternoon three years ago, Skender Hoti received an unusual call from a neighbor asking whether he was moving out of his Lake ... This was an attorney operating under a court-ordered guardianship. ... By John Pacenti ...](https://www.palmbeachpost.com/article/20150403/NEWS/812064418Apr%203,%202015%20-%20One%20afternoon%20three%20years%20ago,%20Skender%20Hoti%20received%20an%20unusual%20call%20from%20a%20neighbor%20asking%20whether%20he%20was%20moving%20out%20of%20his%20Lake%20...%20This%20was%20an%20attorney%20operating%20under%20a%20court-ordered%20guardianship.%20...%20By%20John%20Pacenti%20...)

Guardianships: A Broken Trust: Gwen Batson: Savitt Clears ...

nasga-stopguardianabuse.blogspot.com/2016/01/...

Hoti said he saw Savitt scream at deputies: "You can't do that. I'm a judge's wife. I'm Judge Colin's wife." Three days after the seizure of Hoti's property, Colin recused himself from the case. Savitt wasn't Batson's guardian, yet Judge French approved paying her \$1,500 of Batson's money.

whose stories were reported was falsely arrested for the ludicrous charge of “interference” with “custody” of her own son when she tried to remove her son from the Florida Sponsored Guardian Racket.⁴¹ Landon Reid has been forcibly disappeared from the face of the earth. Patty Reid does not know where her son is and has not seen her son in over 2 years. Her son has no idea why his mother is not with him and is cruelly led to believe his mother abandoned him.

- c. **Glenda Smith and her war veteran husband, Alan Smith.** Their marriage was illegally “annulled” by the Florida Sanctioned Guardian Racketeers who viciously tortured Mr. Smith;⁴² Mrs. Smith was not allowed to see her husband and pleaded for Stone to see Mr. Smith. Stone learned that he had bloody injuries on his face, was not being fed and was so traumatized, he could not speak and was thereafter prohibited from seeing Mr. Smith. It is believed the guardian, John Cramer has been arrested 3 times for D.U.I. He is the guardian for a the widow of a Robert Montgomery, whose wealth is being systemically embezzled and whose daughter had been ceaseless unlawfully arrested for trying to protect her mother and her mother’s assets.
 - d. Teresa Kennedy and her aunt. Ms. Kennedy is a Harvard educated author⁴³.
183. These unthinkable Gestapo type- atrocities are brazenly taking place in corrupt color of law courts throughout the state of Florida.
 184. Even after Pacenti’s extensive and exhaustive expose, the only minuscule result was the removal of the license of a guardian who was working in collusion with her husband, Martin Colin, the presiding judge to embezzle the life savings of vulnerable adults she was entrusted

⁴¹ **Disability Rights: When Is Taking Your Mother to Lunch a Felony?** Janet Phelan: One might come away with the impression that the US simply views its elders as bank accounts to be harvested, without ...

US Political Prisoner Update - activistpost.com

www.activistpost.com/2016/06/us-political...

Taking Your Mother to Lunch is a Felony Barbara Stone was on house arrest for close to a year for taking her mother, who was under guardianship in Florida, to Denny’s Restaurant.

How They Get Away with Egregious Professional Guardianship ...

www.case-abuse.org/professional-guardianship-fraud-by-larsen

Finding no one around to help her, Barbara used a wheelchair and put her mother in her car, and tried to take her to Denny’s Restaurant for lunch. Barbara was stopped by police and thrown in jail, and her mother was taken to a hospital where it was verified that she was malnourished, dehydrated, bruised, and a host of other medical problems from lack of care under guardianship.

⁴² **Marriage annulment in guardianship case heads to Florida ...**

www.palmbeachpost.com/lifestyles/health/marriage...

John Pacenti @jpacenti ... Circuit Judge Martin Colin threw her out of the courtroom. ... The 4th DCA wants to know whether a judge can approve a marriage after the fact or whether the ...

Post investigates: How professional guardian got marriage annulled ...

<https://www.palmbeachpost.com/article/20150403/NEWS/812063143>

Apr 3, 2015 - *Glenda Martinez-Smith* found the love of her life as a senior citizen. ... By *John Pacenti* ... \$200,000 and counting — in legal fees fighting guardian John Cramer and orders by judges on his behalf. ... a retired physician from Aventura who is co-founder of Americans Against Abusive Probate Guardianships.

⁴³ **www.elderdignity.org – The Right to be Protected & Respected**

elderdignity.org

The Guardian refused to let Lillie’s 83-year-old sister and 50+ nieces and nephews know where she is. ... Teresa Kay-Aba Kennedy, was a featured speaker at the AAAPG ...

to protect ⁴⁴ and the removal of Martin Colin the predator judge from acting as a judge in guardianship ⁴⁵ instead of their being transferred to the federal penitentiary.

185. Thus serial murders by the Florida Sanctioned Guardian Racket perpetuate as is reflected by the 9 dead bodies found in an urn of serial killer/guardian Rebecca Fierle.
186. The public recognizes the embezzlement perpetrated in the racket as evidenced by their jury verdict against a participant in the Florida Sanctioned Guardian Racket. ⁴⁶
187. 18 U.S.C. § 1964(c) defines “racketeering activity” as follows:

(1) “racketeering activity” means

(A) any act or threat involving murder, kidnapping, gambling, arson, robbery, bribery, extortion, dealing in obscene matter,...which is chargeable under State law and punishable by imprisonment for more than one year;

(B) any act which is indictable under any of the following provisions of title 18, United States Code:

Section 201 (relating to bribery), sections 471, 472, and 473 (relating to counterfeiting), section 659 (relating to theft from interstate shipment) if the act indictable under section 659 is felonious, section 1028 (relating to fraud and related activity in connection with identification documents), section 1029 (relating to fraud and related activity in connection with access devices), section 1341 (relating to mail fraud), section 1343 (relating to wire fraud), sections 1461–1465 (relating to obscene matter), section 1503 (relating to obstruction of justice), section 1510 (relating to obstruction of criminal investigations), section 1511 (relating to the obstruction of State or local law enforcement), section 1512 (relating to tampering with a witness, victim, or an informant), section 1513 (relating to retaliating against a witness, victim, or an informant), [1] section 1951 (relating to interference with commerce, robbery, or extortion), section 1952 (relating to racketeering),

(D) any offense involving fraud connected with a case under title 11 (except a case under section 157 of this title), if the act indictable under such section of such Act was committed for the purpose of financial gain, or

(G) any act that is indictable under any provision listed in section 2332b (g)(5)(B);

188. No-Penis Elmore is colluding with the embezzlement and conversion of Mrs. Stone’s assets by No-Penis Raymond and Alan Stone in violation of 18 U.S.C. § 641⁴⁷, 18 U.S.C. § 645⁴⁸ and 18 U.S.C. § 654.⁴⁹

⁴⁴ **Guardianship registration revoked for Betsy Savitt, wife of ...**

www.palmbeachpost.com/news/20190321/guardianship...

The state on Thursday revoked the registration of professional guardian Elizabeth “Betsy” Savitt, the wife of former guardianship Judge Martin Colin and the subject of criminal and ...

⁴⁵ **All power over adult guardianship severed for Judge Colin ...**

www.palmbeachpost.com/news/20160223/all-power...

Circuit Judge Martin Colin’s last vestige of power in the adult guardianship arena is now severed. ... John Pacenti @jppacenti ... They say the judge’s wife took tens of thousands of dollars in ...

⁴⁶ Jury hits lawyers with \$16.4M for doing senior wrong in ...

www.palmbeachpost.com/news/jury-hits-lawyers...

Oliver Wilson Bivins Sr. was an oil man whose family were pioneers in Amarillo, Texas. He visited his Florida condo infrequently yet ended up under control of a professional guardian.

189. No-Penis Elmore and No-Penis Raymond have conspired to commit offense or to defraud the United States in violation of 18 U.S.C. 371⁵⁰ by conspiring to and /or sanctioning the use of a court to operate a racket.
190. A pattern of illegal activities committed by the Defendants the "Predicate Acts," described herein were done with the purpose of financial gain and were done within the past ten (10) years and continuing.
191. During the ten (10) calendar years preceding June, 2019, the Defendants did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B) by operating a Florida Sanctioned Guardian Racket.
192. All Defendants engaged in these RICO predicate acts in violation of the RICO law at 18 U.S.C. § 1962(b) (prohibited activities).
193. The Defendants are engaged in prohibited activities in criminal violation of 18 U.S.C. § 1961(5)⁵¹ and 18 U.S.C. § 1962(b)⁵² by operating a Florida Sanctioned Guardian Racket.

⁴⁷ **18 U.S. Code § 641. Public money, property or records**

Whoever embezzles, steals, purloins, or knowingly converts to his use or the use of another, or without authority, sells, conveys or disposes of any record, voucher, money, or thing of value of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof; or

Whoever receives, conceals, or retains the same with intent to convert it to his use or gain, knowing it to have been embezzled, stolen, purloined or converted—

Shall be fined under this title or imprisoned not more than ten years, or both; but if the value of such property in the aggregate, combining amounts from all the counts for which the defendant is convicted in a single case, does not exceed the sum of \$1,000, he shall be fined under this title or imprisoned not more than one year, or both.

⁴⁸ **18 U.S. Code § 645. Court officers generally**

Whoever, being a United States marshal, clerk, receiver, referee, trustee, or other officer of a United States court, or any deputy, assistant, or employee of any such officer, retains or converts to his own use or to the use of another or after demand by the party entitled thereto, unlawfully retains any money coming into his hands by virtue of his official relation, position or employment, is guilty of embezzlement and shall, where the offense is not otherwise punishable by enactment

⁴⁹ **18 U.S. Code § 654. Officer or employee of United States converting property of another**

Whoever, being an officer or employee of the United States or of any department or agency thereof, embezzles or wrongfully converts to his own use the money or property of another which comes into his possession or under his control in the execution of such office or employment, or under color or claim of authority as such officer or employee, shall be fined under this title or not more than the value of the money and property thus embezzled or converted, whichever is greater, or imprisoned not more than ten years, or both; but if the sum embezzled is \$1,000 or less, he shall be fined under this title or imprisoned not more than one year, or both.

⁵⁰ **§ 371. Conspiracy to commit offense or to defraud United States**

If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.

If, however, the offense, the commission of which is the object of the conspiracy, is a misdemeanor only, the punishment for such conspiracy shall not exceed the maximum punishment provided for such misdemeanor

⁵¹ **18 U.S.C. § 1961(5)**, "pattern of racketeering activity" requires at least two acts of racketeering activity, one of which occurred after the effective date of this chapter and the last of which occurred within ten years (excluding any period of imprisonment) after the commission of a prior act of racketeering activity.

⁵² **18 U.S. Code § 1962. Prohibited activities**

(a) It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity or through collection of an unlawful debt in which such person has participated as a

194. The Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective racketeering activities by participating in a Florida Sanctioned Guardian Racket, also in violation of the RICO law at 18 U.S.C. § 1962(b).
195. The Defendants are involved in the Acquisition and Maintenance of an Interest in and Control of an Enterprise Engaged in a Pattern of Racketeering Activity by participating in a Florida Sanctioned Guardian Racket in violation of 18 U.S.C. §§ 1961(5),⁵³ 1962(b).
196. The Defendants did associate with a RICO enterprise of individuals who were associated in fact and who engaged in, and whose activities did affect, interstate and foreign commerce by participating in a Florida Sanctioned Guardian Racket.
197. The Defendants operate as an “enterprise” within the meaning of RICO, the activities of which effect interstate and foreign commerce by participating in a Florida Sanctioned Guardian Racket.
198. Likewise, the Defendants did conduct and/or participate, either directly or indirectly, in the conduct of the affairs of said RICO enterprise through a pattern of racketeering activity by participating in a Florida Sanctioned Guardian Racket all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(c).
199. The Defendants did conspire to acquire and maintain an interest in a RICO enterprise engaged in a pattern of racketeering activity by participating in a Florida Sanctioned Guardian Racket in violation of 18 U.S.C. §§ 1961(5) and 18 U.S.C. §§ 1962(b) and (d).
200. The Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective racketeering activities by participating in a Florida Sanctioned Guardian Racket also in violation of 18 U.S.C. § 1962(d) (prohibited activities).
201. The Defendants have acted in criminal violation of the federal mail fraud statute 18 U.S.C. § 1341⁵⁴ by using the court to perpetrate a Florida Sanctioned Guardian Racket.

principal within the meaning of section 2, title 18, United States Code, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in acquisition of any interest in, or the establishment or operation of, any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce. A purchase of securities on the open market for purposes of investment, and without the intention of controlling or participating in the control of the issuer, or of assisting another to do so, shall not be unlawful under this subsection if the securities of the issuer held by the purchaser, the members of his immediate family, and his or their accomplices in any pattern or racketeering activity or the collection of an unlawful debt after such purchase do not amount in the aggregate to one percent of the outstanding securities of any one class, and do not confer, either in law or in fact, the power to elect one or more directors of the issuer.

(b) It shall be unlawful for any person through a pattern of racketeering activity or through collection of an unlawful debt to acquire or maintain, directly or indirectly, any interest in or control of any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce.

(c) It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt.

(d) It shall be unlawful for any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of this section.

⁵³ 18 U.S.C. § 1961(5), “pattern of racketeering activity” requires at least two acts of racketeering activity, one of which occurred after the effective date of this chapter and the last of which occurred within ten years (excluding any period of imprisonment) after the commission of a prior act of racketeering activity.

202. The Defendants acted in criminal violation of the federal wire fraud statute under 18 U.S.C. 1343 ⁵⁵ when they transmitted or caused to be transmitted by means of writings, signs, signals, pictures, sounds, telephone and cellular telephone calls, documents, facsimiles, emails, instant messages, wire, radio, or television communication and any other form of communication in interstate or foreign commerce, for the purpose of executing such scheme or artifice to perpetrate a Florida Sanctioned Guardian Racket.
203. The Defendants have made false statements in violation of 18 U.S.C. § 1001 ⁵⁶ and could be charged and convicted of multiple, related violations of law which form a pattern and practice and which violations are each potentially punishable by more than one year in jail constituting false statements to officials of the U.S. Government to perpetrate a Florida Sanctioned Guardian Racket.
204. By virtue of the predicate acts described in this Complaint, including without limitations: engaging in monetary transactions improperly derived from unlawful activity, the Defendants transferred, received, furthered income that was derived, both directly and indirectly, from a pattern of racketeering activity in which each of them participated as a principal and used and invested, both directly and indirectly, such income and the proceeds of such income, in establishing, operating and furthering a Florida Sanctioned Guardian Racket, an illegal enterprises in violation of 18 U.S.C. § 1962(a).
205. The Defendants have violated Stone's First Amendment Rights.
206. By reason of the wrongful conduct of the Defendants, each and every one of them, jointly and severally, Stone has suffered harm in the form of having her guaranteed Constitutional rights violated, their business and property rights have been violated, and her rights and property under the due process clause of the U.S. Constitution and her freedom of speech and association guaranteed under the U.S. Constitution have been severely comprised.

⁵⁴ 18 U.S.C. § 1341 provides: a. Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use any counterfeit or spurious coin, obligation, security, or other article, or anything represented to be or intimated or held out to be such counterfeit or spurious article, for the purpose of executing such scheme or artifice or attempting so to do, places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, shall be fined under this title or imprisoned not more than 20 years, or both.

⁵⁵ 18 U.S.C. § 1343 provides: a. Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.

⁵⁶ 18 U.S.C. § 1001 provides: (a) except as otherwise provided in this section, whoever, in any manner within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully – (1) falsifies, conceals, or covers up by any trick scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

207. The Defendants conspire in the operation of a Florida Sanctioned Guardian Racket in violation of Stone's equal rights under 42 U.S. Code § 1961 ⁵⁷.
208. The Defendants are maliciously retaliating against and intimidating Stone for exposing and opposing their corrupt color of law activities.
209. The Defendants are violating 42 U.S.C. § 12203 ⁵⁸
210. As a direct and proximate result of the Defendants violation of 18 U.S.C. § 1962(a), Stone suffered the loss of valuable property, financial services and support, and suffered other business and pecuniary damages.
211. As a direct and proximate result of the Defendants violation of 18 U.S.C. § 1962(a), Stone has suffered severe emotional distress.
212. As a direct and proximate result of the intentional and willful actions of the Defendants each and every one of them, jointly and severally, in their individual and official capacities, Plaintiff demands judgment be entered against the Defendants, including an award of compensatory and actual damages, punitive damages, equitable relief, reasonable attorneys' fees, interest and costs, and award in an amount to be determined by a jury.
213. The Defendants are enabling and participating in a Florida Sanctioned Guardian Racket, forcibly seizing Plaintiff's mother to use her in a human trafficking scheme and seize her life savings, home and other property in violation of 18 U.S. Code § 373. ⁵⁹
214. Only a federal criminal investigation probe similar to Operation Greylord ⁶⁰ and Kids For Cash described herein can root out the perpetrators of this demonic cancer in America perpetrated by the Florida Sponsored Guardian Racket.

⁵⁷ 42 U.S. Code § 1961 (a) **STATEMENT OF EQUAL RIGHTS**

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

⁵⁸ 42 U.S. Code § 12203. Prohibition against retaliation and coercion

(a) RETALIATION

No person shall discriminate against any individual because such individual has opposed any act or practice made unlawful by this chapter or because such individual made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this chapter.

(b) INTERFERENCE, COERCION, OR INTIMIDATION

It shall be unlawful to coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other individual in the exercise or enjoyment of, any right granted or protected by this chapter.

⁵⁹ 18 U.S. Code § 373. **Solicitation to commit a crime of violence**

- (a) Whoever, with intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicits, commands, induces, or otherwise endeavors to persuade such other person to engage in such conduct, shall be imprisoned not more than one-half the maximum term of imprisonment or (notwithstanding section 3571) fined not more than one-half of the maximum fine prescribed for the punishment of the crime solicited, or both; or if the crime solicited is punishable by life imprisonment or death, shall be imprisoned for not more than twenty years.

⁶⁰ **Operation Greylord** was an investigation conducted jointly by the Federal Bureau of Investigation, the IRS Criminal Investigation Division, the U.S. Postal Inspection Service, the Chicago Police Department Internal Affairs Division and the Illinois State Police into corruption in the judiciary of Cook County, Illinois (the Chicago jurisdiction). The FBI named the investigation "Operation Greylord" after the curly wigs worn by British judge. The first listening device ever placed in a judge's chambers occurred in the undercover phase, when

215. Wherefore Stone seek compensatory, punitive and treble damages from each and every Defendant.
216. Plaintiff demands that judgment be entered against the Defendants each and every one of them, jointly and severally, including an award of treble damages as consistent with 18 U.S.C. § 1964(c), compensatory and actual damages, reasonable attorneys' fees, interest, costs, and an award that a jury deems just and proper.
217. Stone seeks this Court issue and order requiring a criminal investigation by the F.B.I.

**XI. COUNT SEVEN
DISCRIMINATION AND RETALIATION
IN VIOLATION OF THE AMERICANS WITH DISABILITIES ACT
AND AMENDMENT
AGAINST ALL DEFENDANTS**

218. The allegations set forth in Paragraphs 1-217 are incorporated herein.
219. The Department of Justice (DOJ) was delegated the authority by Congress to promulgate regulations implementing the Americans with Disabilities Act of 1990 as amended ("ADA") under 42 U.S.C.A. § 12134(a). The DOJ's regulations provide that "all programs, services, and regulatory activities relating to law enforcement, public safety, and the administration of justice, including courts and correctional institutions, are governed by the ADA". 28 C.F.R. § 35.190(b)(6).
220. Title II of the ADA prohibits the exclusion of persons with disabilities from participating in, or denying the benefits of, the goods services, programs and activities of the entity or otherwise discriminating against persons on the basis of disability. 42 U.S.C.A. § 12132.
221. Stone's mother is a disabled persons as defined by 42 U.S.C.A. § 12131(1).
222. At all times relevant hereto Defendants have whether individually, collectively, jointly and whether in concert among all or select few, in violation of Title II of 42 U.S.C. § 12101 et seq. the ADA and in violation of the First, Fifth and Fourteenth Amendments of the U.S. Constitution have in bad faith, assumed roles adversarial to Stone's and her mother's rights, privileges and immunities and depriving them of in violation of 42 USC Sections 1981, 1983 and 1985, the free exercise of the First Amendment right to petition for redress and to associate freely with those of their choosing, the Fourth Amendment right to privacy and to be secure in their person and free from unreasonable search and seizures, the fifth and fourteenth Amendment rights to due process of law and equal protection under the law and the rights of familiar unity and the Ninth Amendment right to privacy and persona autonomy in Plaintiffs' rights to choose freely in pursuit of their own happiness, dignity and self- determination.
223. At all times relevant hereto and since the inception of this cause, Stone has been the victim of invidious discrimination by the willful and deliberate indifference of the Defendants
 - a. in violation of 28 C.F.R. § 35.134(b) and because Stone has asserted herself to aid and encourage her mother in the full attainment and enjoyment of her rights as a qualified

after hearing tapes recorded by undercover agent/prosecutor Hake, a higher court found evidentiary probable cause and allowed the FBI to bug the narcotics court chambers of Judge Wayne Olson, one of those later convicted of corruption. Wikipedia

individual with a disability, the Defendants have deliberately retaliated against Stone by resorting to coercion, threats, intimidation and interference with both Plaintiffs in the exercise and enjoyment of those rights granted and protected by the ADA and 28 C.F.R. Part 35;

- b. because Stone has allegedly made charges No-Penis Elmore about his participation in the Florida Sponsored Guardian Racket, No-Penis Elmore grossly engaged in willful and malicious retaliation to cause the illegal arrest of Stone.
224. Because Stone has testified against and made charges against No-Penis Elmore, he has maliciously engaged in an ongoing and habitual pattern of unlawful retaliation against Stone.
 225. At all times relevant hereto and because of her disability, Defendants have whether individually, collectively, jointly and whether in concert among all or select few, in violation of Title II of 42 U.S.C. § 12101 et seq. The Americans with Disabilities Act 1990 as amended and in violation of the First, Fifth and Fourteenth Amendments of the U.S. Constitution intentionally and with deliberate indifference, excluded Stone and her mother completely appearing at and or participating in any and all decision-making which effect the ultimate disposition and control of Stone's mother's assets
 226. At all times relevant hereto and because of her disability, Defendants have whether individually, collectively, jointly and whether in concert among all or select few, in violation of Title II of 42 U.S.C. § 12101 et seq. The Americans with Disabilities Act 1990 as amended and in violation of the First, Fifth and Fourteenth Amendments of the U.S. Constitution have in bad faith, assumed roles adversarial to Stone's mother's rights, privileges and immunities and depriving Stone and her mother of in violation of 42 USC Sections 1981, 1983 and 1985, the free exercise of the First Amendment right to both petition for redress and the right to associate freely with those of their choosing, the Fourth Amendment right to privacy and to be secure in her person and paper free from unreasonable search and seizures, the fifth and fourteenth Amendment rights to due process of law and equal protection under the law and the rights of familiar unity and the Ninth Amendment right to privacy and persona autonomy in Stone's and her mother's right to choose freely in pursuit of their own happiness, dignity and self- determination.
 227. As the direct and proximate result of the foregoing acts of discrimination, retaliation and violations of the ADA, Stone has been denied and deprived of due process of law and equal protection under the law and cannot receive a fair, unbiased and prejudice-free process in the venue of the Florida courts.
 228. Plaintiff seeks compensatory and punitive damages against the Defendants.

XII. TRIAL BY JURY

229. The allegations set forth in Paragraphs 1-228 are incorporated herein.
230. Plaintiff seeks and demands a **Trial by Jury** on each and every claim for damages set out herein under Rule 38.

XIII. OBJECTION TO MAGISTRATE JUDGE

231. The allegations set forth in Paragraphs 1-231 are incorporated herein.

232. Plaintiff objects, does not consent to and does not recognize jurisdiction by any magistrate judge.

XIV. FULL EN BANC PANEL OF JUDGES IS SOUGHT

233. The allegations set forth in Paragraphs 1-332 are incorporated herein.

234. Because of the extraordinary human rights violations, public policy considerations and unlawful actions of government officials of another state, Stone seeks a full en banc panel of judges.

XV. CRIMES AND CRIMINAL LIABILITY

235. The allegations set forth in Paragraphs 1-334 are incorporated herein.

236. It is unthinkable that we are in the year 2019 in a supposed advanced nation of laws yet the Defendants engage in activities identical to medieval laws in the 15th century with impunity.

237. Thus Plaintiff hereby states the obvious, oppressive and depraved Crimes against Humanity that are inherent in this aberration:

- a. **Murder, human trafficking and looting enterprise:** This simulated, draconian law is responsible for creating a organized crime enterprise that is responsible for the murder, human trafficking and looting of hundreds of thousands of vulnerable Florida citizens and the destruction of entire families.
- b. **Forcible disappearance:** It is maniacal that an American citizen could be forcibly disappeared from their family and the world and become "owned" by another citizen.
- c. **Venial, barbaric remnant of slavery and forced labor camps:** Amendment 13, Section 1 of the Constitution abolishes slavery and involuntary servitude.⁶¹

⁶¹ <https://www.justice.gov/crt/involuntary-servitude-forced-labor-and-sex-trafficking-statutes-enforced>

Involuntary Servitude, Forced Labor, and Sex Trafficking Statutes Enforced

A number of provisions in the U.S. Code target trafficking in persons, also known as involuntary servitude/slavery or forced labor. These provisions are contained in Chapter 77 of Title 18 and are sometimes referred to generally as Chapter 77 offenses. The Trafficking Victims Protection Act (TVPA) of 2000 supplemented existing laws, primarily 18 U.S.C. § 1584 (Involuntary Servitude), and also provided new tools to combat trafficking. Key statutes are excerpted below.

Peonage

Summary: Section 1581 of Title 18 makes it unlawful to hold a person in "debt servitude," or peonage, which is closely related to involuntary servitude. Section 1581 prohibits using force, the threat of force, or the threat of legal coercion to compel a person to work against his/her will. In addition, the victim's involuntary servitude must be tied to the payment of a debt.

18 U.S.C. § 1581

(a) Whoever holds or returns any person to a condition of peonage, or arrests any person with the intent of placing him in or returning him to a condition of peonage, shall be fined under this title or imprisoned not more than 20 years, or both. If death results from the violation of this section, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, the defendant shall be fined under this title or imprisoned for any term of years or life, or both.

(b) Whoever obstructs, or attempts to obstruct, or in any way interferes with or prevents the enforcement of this section, shall be liable to the penalties prescribed in subsection (a).

Involuntary Servitude

Summary: Section 1584 of Title 18 makes it unlawful to hold a person in a condition of slavery, that is, a condition of compulsory service or labor against his/her will. A Section 1584 conviction requires that the victim be held

against his/her will by actual force, threats of force, or threats of legal coercion. Section 1584 also prohibits compelling a person to work against his/her will by creating a "climate of fear" through the use of force, the threat of force, or the threat of legal coercion [i.e., If you don't work, I'll call the immigration officials.] which is sufficient to compel service against a person's will.

18 U.S.C. § 1584

Whoever knowingly and willfully holds to involuntary servitude or sells into any condition of involuntary servitude, any other person for any term, or brings within the United States any person so held, shall be fined under this title or imprisoned not more than 20 years, or both. If death results from the violation of this section, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill, the defendant shall be fined under this title or imprisoned for any term of years or life, or both.

Forced Labor

Summary: Section 1589 of Title 18, which was passed as part of the TVPA, makes it unlawful to provide or obtain the labor or services of a person through one of three prohibited means. Congress enacted § 1589 in response to the Supreme Court's decision in *United States v. Kozminski*, 487 U.S. 931 (1988), which interpreted § 1584 to require the use or threatened use of physical or legal coercion. Section 1589 broadens the definition of the kinds of coercion that might result in forced labor.

18 U.S.C. § 1589

Whoever knowingly provides or obtains the labor or services of a person--

- (1) by threats of serious harm to, or physical restraint against, that person or another person;
- (2) by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
- (3) by means of the abuse or threatened abuse of law or the legal process,

shall be fined under this title or imprisoned not more than 20 years, or both. If death results from the violation of this section, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill, the defendant shall be fined under this title or imprisoned for any term of years or life, or both.

Trafficking with Respect to Peonage, Slavery, Involuntary Servitude, or Forced Labor

Summary: Section 1590 makes it unlawful to recruit, harbor, transport, or broker persons for labor or services under conditions which violate any of the offenses contained in Chapter 77 of Title 18.

18 U.S.C. § 1590

Whoever knowingly recruits, harbors, transports, provides, or obtains by any means, any person for labor or services in violation of this chapter shall be fined under this title or imprisoned not more than 20 years, or both. If death results from the violation of this section, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse, or the attempt to commit aggravated sexual abuse, or an attempt to kill, the defendant shall be fined under this title or imprisoned for any term of years or life, or both.

Sex Trafficking of Children or by Force, Fraud, or Coercion

Summary: Section 1591 criminalizes sex trafficking, which is defined as causing a person to engage in a commercial sex act under certain statutorily enumerated conditions. A commercial sex act means any sex act, on account of which anything of value is given to or received by any person. The specific conditions are the use of force, fraud, or coercion, or conduct involving persons under the age of 18. The punishment for conduct that either involves a victim who is under the age of 14 or involves force, fraud, or coercion is any term of years or life. The punishment for conduct that involves a victim between the ages of 14 and 18 is 40 years.

18 U.S.C. § 1591

Whoever knowingly--

- (1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States; recruits, entices, harbors, transports, provides, or obtains by any means a person; or
- (2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing that force, fraud, or coercion described in subsection (c)(2) will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

- d. criminal endeavor. The removal of all profit from this industry would eliminate this predatory self created cottage industry.
 - e. **Oppressive, despotic and backwoods:** One need only look to Sweden and other progressive countries to see that there are extraordinary enlightened options to this country's venal cruel punishment of its elderly vulnerable citizens. These countries morally and legally advance a system to integrate their vulnerable citizens into the community with non-paid assistance as needed or when requested instead of enacting unenforced Olmstead-type laws that are trampled upon by the courts and are a charade to the American and international public.
238. These acts against a vulnerable adult are atrocities against human rights and violate international human rights declarations and the United Nations Declaration of Human Rights.

XVI. REMEDIES AND DAMAGES

239. The allegations set forth in Paragraphs 1-338 are incorporated herein.
240. Stone seeks the remedies set forth herein.
241. Transfer of this matter to the F.B.I and DOJ and appointment of a grand jury:
- a. The crimes set forth herein fall within the mandate and mission of and require criminal investigation by the F.B.I. and the DOJ.
 - b. This Court is mandated to issue an Order ordering a criminal investigation of the Defendants herein. The allegations herein of human trafficking, crimes against humanity, embezzlement and other crimes are measure that call for a criminal investigation and

Unlawful Conduct with Respect to Documents in Furtherance of Trafficking, Peonage, Slavery, Involuntary Servitude, or Forced Labor

Summary: Section 1592 makes it illegal to seize documents in order to force others to work. By expanding its coverage to false documents as well as official documents, § 1592 recognizes that victims are often immobilized by the withholding of whatever documents they possess, even if the documents are forged or fraudulent. Section 1592 expands the scope of federal trafficking statutes to reach those who prey on the vulnerabilities of immigrant victims by controlling their papers.

18 U.S.C. § 1592

(a) Whoever knowingly destroys, conceals, removes, confiscates, or possesses any actual or purported passport or other immigration document, or any other actual or purported government identification document, of another person--

(1) in the course of a violation of section 1581, 1583, 1584, 1589, 1590, 1591, or 1594(a);

(2) with intent to violate section 1581, 1583, 1584, 1589, 1590, or 1591; or

(3) to prevent or restrict or to attempt to prevent or restrict, without lawful authority, the person's liberty to move or travel, in order to maintain the labor or services of that person, when the person is or has been a victim of a severe form of trafficking in persons, as defined in section 103 of the Trafficking Victims Protection Act of 2000, *shall be fined under this title or imprisoned for not more than 5 years, or both.*

(b) Subsection (a) does not apply to the conduct of a person who is or has been a victim of a severe form of trafficking in persons, as defined in section 103 of the Trafficking Victims Protection Act of 2000, if that conduct is caused by, or incident to, that trafficking.

Additional provisions of the TVPA provide for mandatory restitution (18 U.S.C. § 1593) and forfeiture (18 U.S.C. § 1594(b)), criminalize attempt (18 U.S.C. § 1594(a)), and give victims an avenue for civil lawsuits (18 U.S.C. § 1595).

- appointment of a grand jury and the transfer of this matter to the F.B.I.⁶² and the Department of Justice⁶³ and the ordering of wire taps and subpoenas.
- c. These measures mandate and Stone hereby request the issuance of an Order to Trump, mandating he issue an Executive Order to the F.B.I. and the D.O.J. to enforce the law and criminally investigate the Florida Sanctioned Guardian Racket.
242. Stone seeks a trial by jury and hearing on actual damages, general, compensatory, punitive and treble damages as set forth below for violations of rights, privileges and immunities including but not limited to due process of law both procedurally and substantively, pain, suffering, mental and emotional distress and applicable fees, costs and interests as allowed by law as follows:
- a. an award of compensatory and actual damages in the sum \$25,000,000 separately and individually, punitive damages in the sum of \$25,000,000 separately and individually, equitable relief, reasonable attorneys' fees, interest, and costs against each and every one of them jointly and severally as to each Defendant.
 - b. For the RICO violations, an award of trebled damages as consistent with 18 U.S.C. § 1964(c), compensatory and actual damages, reasonable attorneys' fees, interest and costs from each and every one of them jointly and severally as to each Defendant. separately and individually to each Plaintiff
 - c. Any other award that this Court deems just and proper.
243. Because No-Penis Elmore is associated with aggravating circumstances, Stone seeks an award of punitive damages in an amount sufficient to deter future like conduct by No-Penis Elmore for his depraved atrocities against Stone and Stone's mother, suppression of their Constitutional Rights, right to free speech and deprivation of due process, threats, criminal RICO acts and obstruction of justice and mental anguish and emotional distress in the additional sum of \$10,000,000.
244. Stone also asserts claims for and seeks damages for Extrinsic Fraud, Fraud on the Court, Fraudulent Misrepresentation, Perjury, Harassment, Stalking, Fraudulent Inducement, Conspiracy and Unclean Hands.
245. Stone seeks legal fees and costs pursuant to 42 U.S.C. Section 12205 and 42 U.S.C

⁶² Our Mission (FBI)

To protect the American people and uphold the Constitution of the United States.

Our Priorities

- Protect the United States from terrorist attack
- Protect the United States against foreign intelligence operations and espionage
- Protect the United States against cyber-based attacks and high-technology crimes
- **Combat public corruption at all levels**
- **Protect civil rights**
- Combat transnational/national criminal organizations and enterprises
- **Combat major white-collar crime**
- Combat significant violent crime

⁶³ <https://www.justice.gov/about>

Mission and Strategic Goal of the Department of Justice

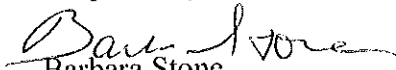
To enforce the law and defend the interests of the United States according to the law; to ensure public safety against threats foreign and domestic; to provide federal leadership in preventing and controlling crime; to seek just punishment for those guilty of unlawful behavior; and to ensure fair and impartial administration of justice for all Americans.

Strategic Goal 4, Promote Rule of Law, Integrity, and Good Government.

Section 1988.

246. Stone seeks this Court order sanctions against all Defendants holding all Defendants in contempt of their duty to protect Stone, her mother and the public and taking such action against Defendants as this Court deems just and proper.
247. Stone seeks this Court order any other relief the Court deems just or proper.

Respectfully submitted:


Barbara Stone

19 West Flagler Street #404

Miami, Florida 33130

barbara.stone.usa@gmail.com

786.271.5016

NOTICE TO MEDIA AND REQUEST FOR PUBLICATION

This lawsuit is being provided to the media and interested parties with a request that they publish it in its entirety and commence an investigation .

EXHIBITA

TACTICS AND PLAYBOOK OF FLORIDA SPONSORED GUARDIAN RACKET

EXHIBIT A

“GUARDIANSHIP” AGENDA USED BY THE FLORIDA COLOR OF LAW GUARDIANSHIP COURTS ¹

1. Affluent, vulnerable retirees or older adults in the state of Florida are targeted by corrupt attorneys, guardians and their cronies by trolling retirement communities, hospitals, banks and by their own self created “seminars” designed to pull in their victim.
2. Once their prey is identified, these vulnerable adults are forced into guardianship by the simple filing of a fraudulent petition whereby they are seized by the court.
3. The usual scenario is for the guardian and their attorney to file fabricated statements against family members falsely alleging “misdeeds” with a colluding judge (usually accusations of “agitation” that the abusive guardians cause themselves by administering contraindicated medications with dangerous side effects that include agitation) in order to obtain a fraudulent court order isolating the victim from their family and their normal life.
4. The vulnerable adults who are entitled to the highest protection under Federal and state laws but in criminal violation of these laws², instead they are treated like war criminals. The atrocities committed on them are identical to atrocities committed on war criminals³.
5. These vulnerable adults are illegally secluded from their family, forced from their homes and isolated in a secret location so that all of the resulting abuse, extortion, embezzlement and other crimes can take place in secret, removed from

¹ The guardianship “playbook” is attached.

² Florida Statutes 825, 744, 415 and others, the Olmstead Doctrine (which requires older adults be integrated into the community, Americans with Disabilities Act, The Elder Justice Act, the U.S. Constitution itself which guarantees due process and the right to life, liberty, property and pursuit of happiness. “Guardianship” criminally violates these laws as its key objective is to seclude vulnerable adults from the community and their families in order to commit their crimes in secret. This is exactly the mechanism used by pervert child molesters who require their victims to keep their abuse a secret.

³ **The War on the Elderly: War Crimes Abound in Probate System ...**
ppjg.me/2018/08/20/the-war-on-the-elderly-war...

The War on the Elderly: War Crimes Abound in Probate System ... While claiming that guardianship is to protect the vulnerable, that the elderly will be treated as ...

all eyes of the public. This is a sinister form of human trafficking **taking place in color of law courts**⁴.

6. They are illegally STRIPPED of all of their civil, human and constitutional rights
7. Their person and their assets are immediately transferred to a complete stranger who has no state license, no credentials and is not regulated by the state.
8. The victims are denied their right to an attorney once they are forced into guardianship.

⁴ **Is Elder Guardianship A New Form Of Human Trafficking?**

nasga-stopguardianabuse.blogspot.com/2016/09/is...

A 2013 AARP report gave a "best guess" estimate of the number of adults under ... within the Florida Department of Elder ... a form of human trafficking. On the ...

America's Shame: Trafficking Our Elderly | SENIOR LIVING WATCH

seniorlivingwatch.wordpress.com/2014/01/21/...

2 thoughts on "America's Shame: Trafficking Our Elderly" cgd1947 January 25, 2016 at 3:13 PM. There is another form of elder human traffic that can take place in the elder's own home.

Is Elder Guardianship A New Form Of Human Trafficking? | HuffPost Life

https://www.huffingtonpost.com/dr-terri.../is-elder-guardianship-a-n_b_11970144.ht...

Sep 13, 2016 - In *Florida*, there are 5 million *people* age 60 and older and that ... Yet, *seniors* who have come to this retirement haven are actively being ...

Judge Martin Colin had a hand in his wife's guardianship cases, state ...

<https://www.palmbeachpost.com/...guardianship.../sWv6eYgvcDeubugXhCoQ4H/>

Sep 1, 2018 - Now nearly a decade later, the state of *Florida* spells out in an wanting out of an assisted care facility full of *elderly people* that her current ..

Elder Guardianship Abuse – www.elderdignity.org

elderdignity.org/elder-guardianship-abuse/

Doctors – Sign off on the incapacity of the *senior* and often refers a petitioner to a ... In *Florida* and Flagler County, these predators are allowed to liquidate the *senior's* ... Post articles, "Is Elder *Guardianship* a New Form of *Human Trafficking*?"

<https://www.abcactionnews.com/.../theyre-court-appointed-to-protect-the-elderly-but-...>

Feb 21, 2019 - Professional *guardians* have become a booming industry in *Florida*, ... They're court-appointed to protect the *elderly*, but who's policing *Florida guardians*? *Florida* doesn't limit how many *people guardians* can oversee and ...

Seniors Stripped Of The Right To Vote; Florida Is A Hotspot | HuffPost ...

https://www.huffpost.com/entry/seniors-stripped-of-the-r_b_12794608

Nov 7, 2016 - As explained in "Is Elder *Guardianship* A New Form Of *Human Trafficking*?", *guardianships* are supposed to protect older citizens. However ...

Guardians from Hell – Tablet Magazine

<https://www.tabletmag.com/scroll/264932/guardians-from-hell>

Jun 21, 2018 - On June 6, Lourdes filed a petition for *guardianship* on the grounds "To isolate and prohibit an *aging* Mother from seeing her daughter is heartbreaking to this GAL. "In 2003 in *Florida*, there were 23 professional *guardians*," he said.

9. They are subjected to horrific atrocities: chemical restraints by administering illegal psychotropic drugs to keep them incoherent, deprived food in order to force feed them, making it easier to lace them with drugs such that their stomach is cut open to implant an unneeded feeding tube,⁵ deprived all sensory and physical activity to accelerate their deterioration, kept completely isolated from the outside world (this is not "isolation", this is "forced disappearance"⁶ and subjected to physical, emotional, sexual abuse and other horrific atrocities⁷.
10. This is done to force horrific family members to file pleading in the color of law courts to plead with the Florida Judicial Terrorists to save the life of their vulnerable family member. Unbeknownst to them, their pleadings are all futile and in vain as all litigation is rigged and preordained.
11. These pleading only serve to advance the objective of this enterprise which is to incite litigation that is used as a pretense to extort the assets of the vulnerable adult (that have already been seized illegally by the color of law court) can be used to pay "fees" to the corrupt attorneys and guardians and kickbacks to the colluding judges. The more the family member fights to protect their loved one, the more money these predators steal from their loved one in the rigged, orchestrated color of law proceeding.
12. The court proceeding are a sham and a pretense where ex parte motions and orders, or tenuous proclamations, self-serving "confidential" reports are exchanged. A "wired court" is working hand and hand with an arsenal of self-dealing attorneys, guardians, judges and judicial officers to disseminate the life savings, possessions, home, car and personal property of their prey.
13. Once all assets of the vulnerable adult are embezzled, their home is sold from under them to continue the money train. Their art, their jewelry, their family heirlooms, their investments, EVERYTHING is looted in this terrorist enterprise that goes by the name of "guardianship".

⁵ Forced feeding by feeding tube has been compared to "waterboarding" used against war criminals

<https://www.businessinsider.com/the-forced-feeding-at-guantanamo-bay-sounds-a-lot-like-waterboarding-2014-3>

⁶ In international human rights law, a forced disappearance (or enforced disappearance) occurs when a person is secretly abducted or imprisoned by a state or political organization or by a third party with the authorization, support, or acquiescence of a state or political organization, followed by a refusal to acknowledge the person's fate and whereabouts, with the intent of placing the victim outside the protection of the law.

According to the Rome Statute of the International Criminal Court, which came into force on 1 July 2002, when committed as part of a widespread or systematic attack directed at any civilian population, a "forced disappearance" qualifies as a crime against humanity.

Often, forced disappearance implies murder. The victim in such a case is abducted, illegally detained and often tortured during interrogation, and killed, with the body hidden. Typically, a murder will be surreptitious, with the corpse disposed of to escape discovery so that the person apparently vanishes. The party committing the murder professes plausible deniability, as nobody can provide evidence of the victim's death.

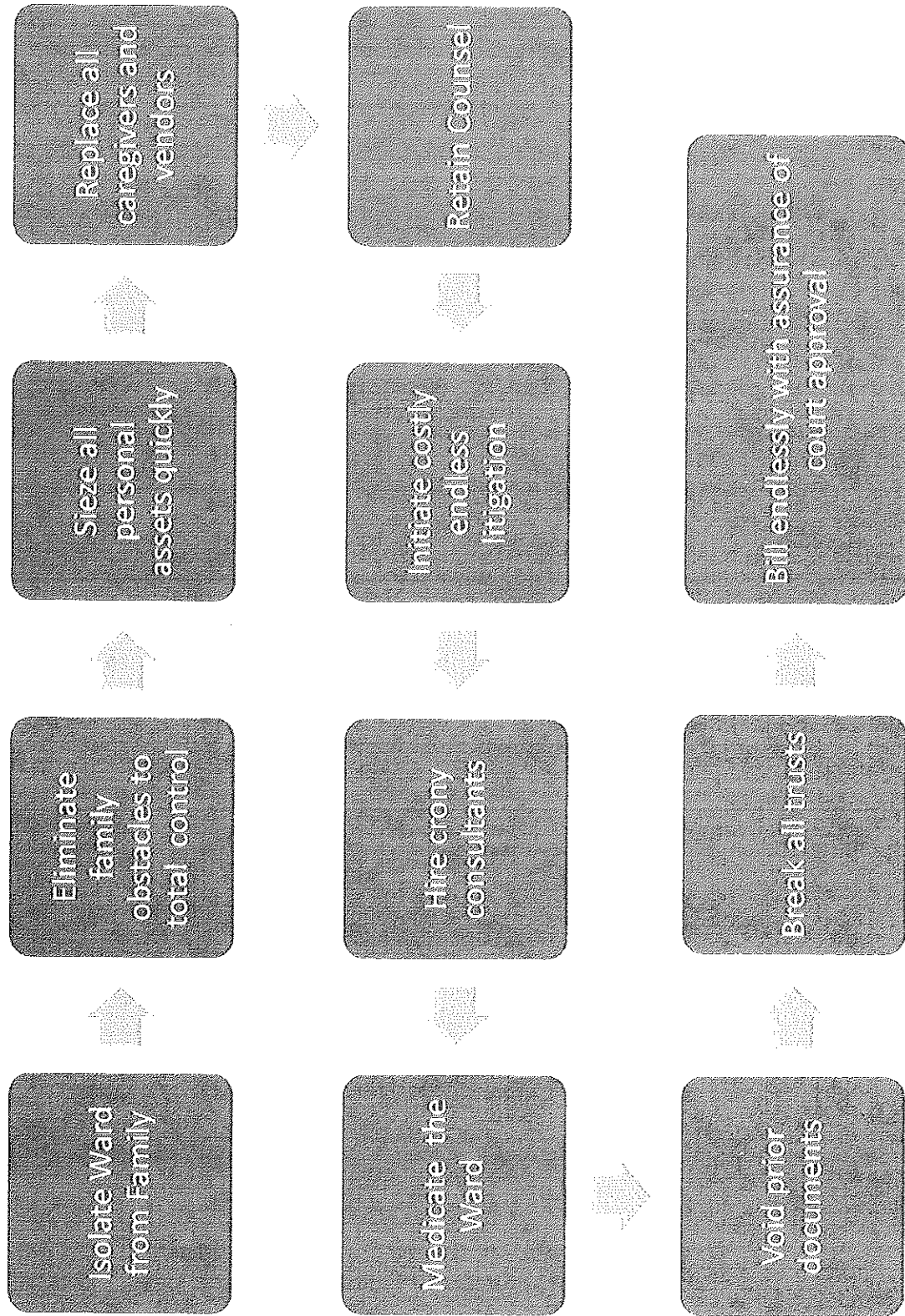
⁷ See attached before and after unthinkable photos of vulnerable adults included in this Application who have been kidnapped in guardianship, forcibly disappeared from their loved ones and subjected to horrific crimes and torture.

14. Thereafter, when the entire life savings of their victim has been sucked dry, their victim is murdered by chemically restraints. They are administered illegal psychotropic drugs carrying black box warning against their use by elder adults as they cause cardiac arrest and stroke. These vulnerable adults who were perfectly competent and physically healthy are put to their death from abuse, drugging, chemically caused heart attacks and other deranged orchestrated murder schemes.
15. The family members are terrorized and extorted themselves as a result of the Guardian Atrocities. Family members are viciously retaliated for speaking up once they catch on to the crime ring that brazenly operates in the Florida Courthouses.
16. As a deliberate and integral tactic of the Florida Color of Law Guardianship Courts, concurrent with the Guardian Atrocities they perpetrate against the Florida vulnerable adult, they attack their family members to extort and embezzle their life savings so the family member will no longer have any assets to take action against or expose the Florida Color of Law Guardianship Courts and unlawfully cause their arrest to silence them.
17. This is done by masterminding and implementing depraved litigation scams (the Embezzlement Scams") against family members by:
 - a. Forcing the family member to hemorrhage money for legal fees to hire their own counsel in a futile effort to obtain remedy from the very court perpetrating the crimes. Moreover, unbeknownst to them, their own attorney is a member of the Florida Color of Law Guardianship Courts and not only deliberately sabotaging them and working with the other side, but also creating and orchestrating additional issues.
 - b. The family member does not even know this is happening until after they have lost their life savings without any relief and finally understand that was the intention all along – that the whole purpose of the enterprise is to engage in rigged, preordained litigation in order to devour fees.
 - c. Causing the family member to lose their job as it is a full time occupation to engage in futile pleas to every Florida agency and court in a desperate attempt to save the life of their loved one.
 - d. Devising depraved distractions by attacks on family members to divert from the guardian atrocities they are committing thereby making family members respond to the distractions in order to orchestrate additional exorbitant legal fees benefiting only the Florida Color of Law Guardianship Courts
 - e. Forcing family members into bankruptcy and foreclosure. They lose their homes, their life savings, their lives are destroyed from being extorted.
 - f. Family members are sued by their own attorneys for illusionary fees.

- g. Family members they are sued in fraudulent "SLAPP"⁸ lawsuits wherein fraudster attorneys and guardians who are preying on their parents use diabolical methods to prevent them from appearing in court, typically failing to give them notice of hearings or providing them with the wrong date. Judgments against their entire life savings are entered against them by default.
- h. Family members are unlawfully arrested for violating illegal orders that prevent them from reporting the abuse of their loved ones and to silence them from exposing the Florida Judicial Racketeering Enterprise,
- i. Family members are forced to expend astronomical fees when they go to other courts seeking justice that is all for naught as the entire state of Florida is a complete locked down cover up racket for the Florida Color of Law Guardianship Courts.

⁸ Strategic lawsuit against public participation: A strategic lawsuit against public participation (SLAPP) is a lawsuit that is intended to censor, intimidate, and silence critics by burdening them with the cost of a legal defense until they abandon their criticism or opposition. Such lawsuits have been made illegal in many jurisdictions on the grounds that they impede freedom of speech.

Guardians Playbook



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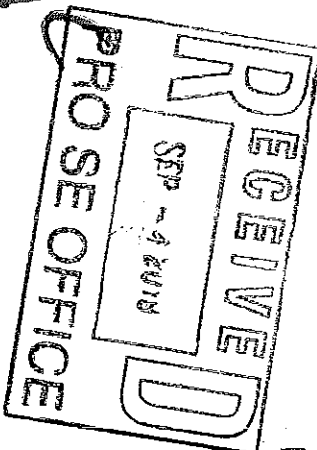
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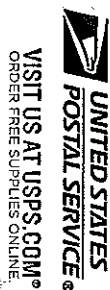
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